

## GEM Partnership Ltd Modern Slavery Statement

This statement is made as part of GEM Partnership Limited commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). This statement summarises how GEM operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act, and relates to GEM's financial year 1<sup>st</sup> April 2025 to 31<sup>st</sup> March 2026 and was approved by the board of directors on Friday 4<sup>th</sup> April 2025.

Maria Miller  
Director

### 1. Our Business

- 1.1 GEM Partnership Limited is a limited company operating in the recruitment and training sector. We supply temporary workers in the Industrial, Commercial, Contact Centre, IT and Engineering sectors.
- 1.2 GEM Partnership operates within the training sector. We deliver Apprenticeship training to Levy clients; Pre-Employment training funded via Adult Education Budget and Commercial training.
- 1.3 GEM is an independent business.

### 2. Who we work with

- 2.1 All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. From time to time, some of these work-seekers operate through their own limited companies.

### 3. Other relationships

- 3.1 As part of our business, we also work with the following organisations:

- 3.1.1 North East Chamber of Commerce
- 3.1.2 Association of Labour Providers
- 3.1.3 Gangmasters & Labour Abuse Authority (current licence holder)
- 3.1.4 The Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com))
- 3.1.5 Institute of Directors
- 3.1.6 The Association of Employment and Learning Providers
- 3.1.7 Matrix
- 3.1.8 Highfield Awarding Body
- 3.1.9 Pearson Awarding Body
- 3.1.10 EAL Awarding Body
- 3.1.11 Innovate Awarding Body
- 3.1.12 United Centre of Excellence Awarding Body
- 3.1.13 City & Guilds Awarding Body
- 3.1.14 Qualitrain group
- 3.1.15 Education Skills Funding Agency
- 3.1.16 North East Combined Authority
- 3.1.17 European Social Funding
- 3.1.18 Department of Work and Pensions
- 3.1.19 JobsAware
- 3.1.20 Hartlepool College of Further Education
- 3.1.21 Bishop Auckland College
- 3.1.22 New College Durham
- 3.1.23 Education Partnership North East
- 3.1.24 North East Automotive Alliance

3.1.25 Chameleon-I Recruitment Software

3.1.26 PICS Training software

#### **4. Our Policies**

GEM's modern slavery policy is available at: [https://www.gempartnership.com/terms\\_conditions/](https://www.gempartnership.com/terms_conditions/)

4.1 GEM has the following policies which incorporate ethical standards for our staff and our suppliers;

4.1.1 Corporate Social Responsibility and Community Policy,

4.1.2 Child Labour and Remediation Policy

4.1.3 Ethical Trading Statement and Policy

4.1.4 Bribery & Corruption Policy

4.1.5 Whistleblowing Policy

4.1.6 Human Rights Statement

4.1.7 Safeguarding Children and Vulnerable Adults Policy

4.1.8 Equality and Diversity Policy and Procedure

4.1.9 Staff Recruitment and Selection Policy

4.1.10 Anti-Harassment and Bullying Policy

4.1.11 Sexual Harassment Policy

4.1.12 Responsible Recruitment Policy

#### **5. Policy development and review**

5.1 GEM's policies are established by our directors based on advice from HR professionals, industry best practice and legal advice. We review our policies on a regular basis or as needed to adapt to changes.

#### **6. Our Processes for Managing Risk**

6.1 In order to assess the risk of modern slavery, we use the following processes with our suppliers:

6.1.1 We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.

6.1.2 We collaborate with our suppliers in order to improve standards and transparency across our supply chain and obtain information on their own risk review and due diligence practices.

6.1.3 We also work with the following organisations in order to identify areas of risk and review effective good practice:

6.1.3.1 North East Chamber of Commerce

6.1.3.2 Gangmasters & Labour Abuse Authority (current licence holder)

6.1.3.3 Association of Labour Providers

6.1.3.4 The Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com))

6.1.3.5 Institute of Directors

6.1.3.6 The Association of Employment and Learning Providers

6.1.3.7 Matrix

6.1.3.8 Highfield Awarding Body

6.1.3.9 Pearson Awarding Body

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- 6.1.3.24 North East Automotive Alliance
- 6.1.3.25 Chameleon-I Recruitment Software
- 6.1.3.26 PICS Training software

- 6.2 Additionally, we have taken the following steps to minimise the possibility of any problems:
  - 6.2.1 Updated Worker Handbook with reporting information and Stronger Together contact details issued to all temporary workers when placed on assignment.
  - 6.2.2 Anonymous Report a Concern form introduced to the internal HR, worker and learner apps
  - 6.2.3 Our staff are encouraged to bring any concerns they have to the attention of management.
- 6.3 After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

## **7. Our Performance**

- 7.1 As part of monitoring the performance of GEM, we review our Modern Slavery & Remediation policy and statement annually and highlight any potential risks to establish appropriate actions and performance indicators to eliminate such risk, these would be agreed by the Board of Directors.

## **8. Our Training**

- 8.1 All of our staff receive training and support that is appropriate to their role. In particular:
  - 8.1.1 Our HR personnel undertake courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
  - 8.1.2 All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can identify and bring any concerns they have to the attention of management. As part of this, our staff are encouraged to discuss any concerns that they have.
- 8.2 Training is reviewed and refreshed annually.