

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 Partnership 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 on a voluntary basis, out of best practice as we currently don't meet the reporting criteria.

This statement is published in accordance with section 54 of the Act, and relates to GEM's financial year 1st April 2026 to 31st March 2027 and was approved by the board of directors on Thursday 15th January 2026.

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 Skills Funding and Commercial training.
- 1.3 GEM Partnership is a Limited 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 Association of Labour Providers
 - 3.1.2 Fair Work Agency (FWA) Licencing Standards for Gangmasters (current licence holder)
 - 3.1.3 The Recruitment and Employment Confederation (www.rec.uk.com)
 - 3.1.4 The Association of Employment and Learning Providers
 - 3.1.5 Robson Laidler LLP
 - 3.1.6 Matrix
 - 3.1.7 Highfield Awarding Body
 - 3.1.8 EAL Awarding Body
 - 3.1.9 Innovate Awarding Body
 - 3.1.10 United Centre of Excellence Awarding Body
 - 3.1.11 Qualitrain group
 - 3.1.12 Department for Education
 - 3.1.13 DSW Awarding Body
 - 3.1.14 North East Mayoral Strategic Authority
 - 3.1.15 European Social Funding
 - 3.1.16 Department of Work and Pensions
 - 3.1.17 JobsAware
 - 3.1.18 Hartlepool College of Further Education
 - 3.1.19 Bishop Auckland College
 - 3.1.20 Education Partnership North East
 - 3.1.21 Chameleon-I Recruitment Software

- 3.1.22 PICS Training software
- 3.1.23 JotForm Software
- 3.1.24 One Advanced Software
- 3.1.25 Merit Payroll Software

4. Our Policies

GEM Partnership's modern slavery policy is available at:

<https://www.gempartnership.com/about/our-policies/>

- 4.1 GEM has the following policies which incorporate ethical standards for our staff and our suppliers;
 - 4.1.1 GEM Partnership Corporate Social Responsibility and Community Statement and Policy
 - 4.1.2 GEM Partnership Child Labour and Remediation Policy
 - 4.1.3 GEM Partnership Ethical Trading Statement and Policy
 - 4.1.4 GEM Partnership Bribery and Corruption Policy
 - 4.1.5 GEM Partnership Whistleblowing Policy
 - 4.1.6 GEM Partnership Human Rights Statement
 - 4.1.7 GEM Partnership Safeguarding Children and Vulnerable Adults Statement and Policy
 - 4.1.8 GEM Partnership Equality and Diversity Policy and Procedure
 - 4.1.9 GEM Partnership Staff Recruitment and Selection Policy
 - 4.1.10 GEM Partnership Anti-Harassment and Bullying Policy
 - 4.1.11 GEM Partnership Sexual Harassment Policy
 - 4.1.12 GEM Partnership Responsible Recruitment Policy
 - 4.1.13 GEM Partnership Inclusion and Inclusive Practice Policy
 - 4.1.14 GEM Partnership Reasonable Adjustments Policy
 - 4.1.15 GEM Partnership Business Transport Policy
 - 4.1.16 GEM Partnership Business Expenses Policy
 - 4.1.17 GEM Partnership Complaints Policy
 - 4.1.18 GEM Partnership Conflict of Interest Policy
 - 4.1.19 GEM Partnership Counter Fraud and Error Prevention Policy
 - 4.1.20 GEM Partnership AI Ethics Policy
 - 4.1.21 GEM Partnership Code of Conduct
 - 4.1.22 GEM Partnership Trainer Standards

5. Policy development and review

- 5.1 GEM Partnership'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 bi annual 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.
- 6.2 We also work with the following organisations in order to identify areas of risk and review effective good practice:
 - 6.2.1 Association of Labour Providers
 - 6.2.2 Fair Work Agency (FWA) Licencing Standards for Gangmasters (current licence holder)
 - 6.2.3 The Recruitment and Employment Confederation (www.rec.uk.com)

- 6.2.4 The Association of Employment and Learning Providers
- 6.2.5 Robson Laidler LLP
- 6.2.6 Matrix
- 6.2.7 Highfield Awarding Body
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- 6.2.24 One Advanced Software
- 6.2.25 Merit Payroll Software

- 6.3 Additionally, we have taken the following steps to minimise the possibility of any problems:
 - 6.3.1 Updated Worker Handbook with reporting information and Stronger Together contact details issued to all temporary workers when placed on assignment.
 - 6.3.2 Anonymous Report a Concern form introduced to the internal HR, worker and learner apps
 - 6.3.3 Our staff are encouraged to bring any concerns they have to the attention of management.
- 6.4 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 Partnership, we review our Modern Slavery and 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.