



Phase 3 Policy Document

Phase 3 – Modern Slavery Policy

Context

Policy owner: James Proctor, Director of Professional & Managed Services

Policy date: 1st May 2020

Last Review Date: 19th May 2022

Review date: To be reviewed upon any significant business or service change affecting property or working location requirements or as a minimum every 1 year

Purpose: To describe the modern slavery policy.

Scope: Phase 3 acknowledges responsibility to comply with all principles of the Modern Slavery Act 2015 and will perform due diligence to provide transparency throughout the organisation.

Linked documents: P3 Contracts of Employment
P3 Health & Safety Policy
P3 Whistleblowing Policy

1. Introduction

- 1.1 Phase 3 Consulting Ltd ('Phase 3) is committed to observing the provisions of the Modern Slavery Act 2015 ('the Act') which aims to put an end to all types of modern slavery in the UK. In particular, section 54 of the Act strives to make sure slavery and human trafficking doesn't take place in business and supply chains both here in the UK and overseas. Modern Slavery is a violation of an individual's fundamental human rights and is against the law. At Phase 3 we fully support the definition of Modern Slavery which includes slavery, forced or coerced labour, human trafficking, child labour and inhumane or discriminatory treatment.
- 1.2 Phase 3 are a leading provider of People Technology Consulting & Services working across the UK with clients including government departments, local authorities, corporate clients and businesses of all sizes and covering a variety of different sectors. We are the People behind Technology ensuring that people technology and people processes are aligned.
- 1.3 Phase 3 Consulting Limited is registered in England at Companies House.
- 1.4 Phase 3 operates from its headquarters in Manchester in the United Kingdom; we use our own staff together with a network of approved partners and contractors. Due diligence is carried out on all on-boarded suppliers and clients at the start of the relationship and throughout the term of our relationship.
- 1.5 This Modern Slavery Act 2015 law applies to any company doing business in the UK with an annual turnover of £36 million or more. The requirements apply to these companies' own operations and their supply chains. Although Phase 3 does not meet this threshold at the current time, we believe it is best practice to have a policy in place.

2. Our policy

- 2.1 Phase 3 is committed to ensuring there is no modern slavery or any scope for modern slavery in part of our business operations. It applies to everyone in our organisation and is available on our external website and intranet.
- 2.2 We will continue to encourage and strive towards a culture where staff and managers are aware of their responsibilities in identifying any potential modern slavery practice and bringing it to the attention of the Directors.

3. Compliance

- 3.1 This Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels: directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

- 3.2 All of our employees, sub-contractors and partners are required to carry out all services ethically whilst promoting good working practices at all levels in accordance with the Act, without reservation.
- 3.3 Phase 3 has systems in place to ensure we: -
- Identify and mitigate the potential risk areas within our business
 - Educate and inform our clients and suppliers of our expectations in regard to eliminating the risk of modern slavery within our business
 - Monitor potential risks and constantly look at new ways to improve
 - Protect whistleblowers

4. Responsibility for the policy

- 4.1 The responsibility for the prevention of modern slavery rests with the Phase 3 Management Team. This policy document has been approved and endorsed by the Directors and Management Team of Phase 3; they have overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.
- 4.2 Managers at all levels are responsible for ensuring those reporting to them: understand and comply with this policy; and are given adequate and regular training on it and the issue of modern slavery.

5. Actions to report Modern Slavery or Human Trafficking

- 5.1 Internal – Employees are encouraged to raise any concerns about suspected modern slavery associated with the company, our clients or our suppliers, and should do this either through their line manager or directly to the Head of Quality Assurance and Governance.
- 5.2 External – Members of the public or people not employed by the company to write, in confidence, to the Head of Quality Assurance and Governance to raise any concern, issue or suspicion of modern slavery in any part of our business.
- 5.3 At Phase 3 we aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form, is or may be taking place in any part of our own business.
- 5.4 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager or a director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure.

- 5.5 Phase 3 will accept and take seriously any concerns communicated anonymously. However, anonymity can present difficulties in investigations and validations and subsequently make the process less effective; individuals are therefore encouraged to put their names to any allegation made.

6. Breaches of the Policy

- 6.1 If an issue is identified with a client, partner, sub-contractor or supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed period of time.
- 6.2 Phase 3 reserves the right to terminate our relationship with individuals, clients, partners or suppliers if it is proven that this policy has been breached.

7. Communication, awareness and review

- 7.1 Our zero-tolerance to Modern Slavery must be communicated to all employees, clients, partners, sub-contractors and suppliers at the outset of any business relationship and reinforced as appropriate.
- 7.2 This policy is reviewed on a regular basis and at least annually; it may be amended from time to time as deemed appropriate for our business.

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