

South Downs Leisure

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South Downs Leisure

Human Resources  
Policies & Procedures

Modern Slavery Policy

Revised June 2024



South Downs  
Leisure

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# South Downs Leisure

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## **Introduction**

This policy sets out South Downs Leisure's (SDL) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. SDL maintains relationships with many different organisations in its supply chains, as well as directly employing large numbers of people. In the light of the general law on employment and human rights and more specifically, the Modern Slavery Act 2015, the Organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains is free from slavery and human trafficking.

## **Organisational Structure and Supply Chains**

This policy covers all the activities of SDL and its subsidiaries. It governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with SDL to familiarise themselves with our modern slavery policy and to act at all times in a way which is consistent with our modern slavery policy.

These organisations and subsidiaries is referred to as "the Group" and they all currently operate in England.

## **Responsibility**

The Human Resources (HR) department will liaise with other relevant departments such as the QA & Compliance to ensure that risk analysis and investigations/due diligence in relation to modern slavery and human trafficking is carried out as required.

HR will ensure that employees are given adequate and regular training on the issue of modern slavery so that everyone understands and complies with this policy.

## **Relevant Policies and Practices**

SDL operates the following policies and practices that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

The Group's policy on whistleblowing encourages all its workers, customers and other business partners to report any concerns related to the direct activities of the organisation or its supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.



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SDL's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the Group's Whistleblowing Policy which is available on the intranet. The nature of the complaint will determine the Group's next course of action.

We endeavour to carry out our own recruitment activities and/or to only use reputable employment agencies to source labour and we carry out appropriate background checks. HR are responsible for the recruitment activities in any of the subsidiaries and are advised to adhere to this policy by ensuring that strict verification of potential employee's right to work is carried out before any offer of employment is made.

SDL expects its subsidiaries and all supply chains to adhere to recruitment practices that ensure that all terms of employment are voluntary. Where necessary and if required, we may request demonstration of compliance with this policy.

## **Due Diligence on Third Parties**

SDL will conduct appropriate due diligence on third parties, such as agents, consultants, and contractors, to ensure their commitment to ethical business practices and compliance with anti-bribery laws. Failure to meet the required standards may result in termination of the business relationship.

## **Awareness & Performance Indicators**

As well as training employees, the Group will raise awareness of modern slavery issues by emailing the Group's modern slavery and human trafficking policy to all employees as well as it being made available on the Group's intranet. We expect employees to refer to this policy and understand what is required of them in relation to modern slavery.

This policy on modern slavery will be communicated to all suppliers, contractors and business partners at appropriate points during SDL's business relationship with them and reinforced as appropriate thereafter.

## **Author:** Human Resources

This Policy will be monitored and reviewed for each financial year by the People and Remuneration Sub Group setting out the steps that SDL has taken during the year to ensure that slavery and human trafficking is not taking place in its supply chains or its own business (or setting out that it has taken no such steps).



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## Legislative Framework

Data Protection Act 2018

## Background Document

Relevant policies are: -

- Recruitment Policy
- Whistleblowing Policy
- Disciplinary Policy
- Probation Policy

## Monitoring and Review

This Policy will be monitored and reviewed by the appropriate Officer\*.

Date of Issue: June 2024

## Updates to policy:

Issue No	Description of Revision	Date	Action By
Draft	First issue	April 2021	HR
2	New look in line with policy review and added in relevant policies/legislation	June 2024	HR

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