glOBAL BUSINESS SHARED SERVICES

**Connecting Talent**



**TALKING TALENT POLICIES:**

Modern Slavery and Human Trafficking Policy



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# Introduction

Talking Talent is an innovative coaching consultancy at the forefront of developing and maximising the female talent pipeline. We have delivered coaching to over 15,000 women and over a 8,000 Managers of both genders, working across many industry sectors and all levels of business. Key to the success of that work is a team of highly experienced and dedicated coaches focused on improving career progression and delivering commercial benefit. Our work extends across the globe partnering with blue chip clients in the U.K., Europe, U.S. and Asia.

We are committed to and support international efforts to promote ethical business practices and policies related to the prevention of the exploitation and abuse associated with modern slavery and human trafficking. We acknowledge responsibility under the Act and will endeavour to ensure that slavery and human trafficking are not taking place within our directly employed workforce, or our supply chain.

We encourage the reporting of any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated and appropriate remedial actions taken.

Our supply chains are not extensive, with the majority of first tier being based in the UK. Our suppliers consist of office goods suppliers, ICT equipment and professional assistance. We consider there to be a low risk from incidents of slavery and human trafficking due to the size and nature of our supply chain.

# Policy statement

**Modern Slavery and Human Trafficking**

* Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
* We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
* 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, interns, agents, contractors, external consultants, third-party representatives and business partners.
* This policy does not form part of any employee's contract of employment and we may amend it at any time.

# Responsibility for the policy

The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

* The Head of Operations has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
* 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 in supply chains.

# Compliance with the policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. We require each of us at Talking Talent to avoid any activity that might lead to, or suggest, a breach of this policy.

* Each employee is encouraged to notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
* Each employee is encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
* If an employee believes or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
* If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Head of Operations.

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 or in any of our supply chains. 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 the Head of Operations immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

# Breaches of this policy

* Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
* We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

# Revision History

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| **Issue Status** | **Date** | **Responsibility** | **Summary of Change** |
| 1.0 | 24.07.2018 | Head of Operations | First Draft |
| 2.0 | 01.12.2018 | Head of Operations | Reviewed & Updated by new Head of Operations |
| 3.0 | 20.06.2019 | Head of Business Operations | Transfer into latest format |
| 4.0 | 01.04.2021 | Head of Business Operations | Reviewed & Updated |