Modern Slavery Policy

1. Summer-Browning Associates Limited (SBA) is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.

2. SBA is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.

3. SBA provides appropriate training and awareness information for all of its staff. In particular:

    - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to Tom Vause.

5. Reports surrounding these issues are taken extremely seriously by our board of directors Tom Vause and Nicolle Browning who are committed to ensuring that all investigations will be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
    - Working with the appropriate organisations to improve standards,
    - Removing that organisation from our preferred supplier list,
    - Passing details to appropriate law enforcement bodies.

6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:

    - The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
    - The effectiveness of enforcement against suppliers who breach policies,
    - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
    - The level of modern slavery training and awareness amongst our staff.

7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.

8. We would also recommend reading this in conjunction with our other policies, including our:
    - Corporate social responsibility policy,
    - Anti-bribery / corruption policy, and
    - Whistle-blowing policy.

This policy was adopted on 14/09/2022 after being agreed by Tom Vause & Nicolle Browning. It is reviewed annually.

Modern Slavery Statement

This statement is made as part of SBA's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how SBA 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 the financial year May 2024 to May 2025. It was approved by the board of directors on 17 June 2024

Tom Vause – Director



Nicolle Browning – Director



Our Business

1 SBA is a limited company operating in the recruitment sector. We provide an extensive range of consultancy and resourcing services to both public and private sectors through our direct capabilities and extensive network of associates. Our services include Commercial and Procurement, Finance, Project and Programme Management, IT, Property and FM, Business Transformation and Change, corporate strategy, Talent Management & Bid Management.

SBA is an independent business.

1.1 Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies. We do not supply work-seekers to hiring companies through any intermediaries. Some of our work-seekers are supplied via other businesses, who facilitate providing them to the eventual hiring company.

The hiring companies that we work with are located in the UK. The work-seekers / workers we supply live in the UK.

Other relationships

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

- sector-specific professional and regulatory bodies
- sector-specific industry bodies
- the Recruitment and Employment Confederation (www.rec.uk.com) and/or the Institute of Recruitment Professionals (www.rec-irp.uk.com)

2 Our Policies

SBA has a modern slavery policy.

In addition, SBA has the following policies which incorporate ethical standards for our staff and our suppliers.

- Environment Policy
- Whistleblowing
- Equal Opportunities

2.1 Policy development and review

SBA's policies are established by our directors, based on advice from HR professionals, industry best practice and legal advice, and in consultation with our stakeholders. We review our policies annually, or as needed to adapt to changes.

3 Our Processes for Managing Risk

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

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.
- We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

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.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.

Our staff are encouraged to bring any concerns they have to the attention of management.

4 Our Performance

As part of monitoring the performance of SBA, we track the following general key performance indicators:

- The level of training amongst your staff,
- The speed with which you investigate related complaints and the effectiveness of any whistle-blowing procedures, and/or

- The level of compliance and transparency you have established in your supply chain.

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our board of directors.

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- the percentage of workers and/or candidates supplied from audited businesses / our preferred supplier list
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We carefully consider our indicators, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

5 Our Training

All of our staff receive training and support that is appropriate to their role. In particular:

- Our senior supply chain managers receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our recruiters, HR personnel, and/or staff involved in our procurement and supply chains undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can 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.

Training is refreshed annually