Anti Modern Slavery Policy

Policy Summary

Modern slavery refers to a group of crimes including slavery, servitude, forced labour and human trafficking. All of these crimes involve the severe exploitation and control of human beings for personal or commercial gain.

At Southern Co-op we pride ourselves on our ethical approach to business. We have a zero tolerance approach to all forms of modern slavery and work hard to ensure that modern slavery is prevented in our business and supply chain.

This policy gives colleagues information about modern slavery and our approach to managing the associated risks.

Every colleague must be aware that failing to follow this policy may result in disciplinary action.

Scope

This policy relates to Southern Co-op and all its subsidiaries. Through this policy and supporting training and awareness initiatives, Southern Co-op will make colleagues aware of the existence of modern slavery, how to identify it and what to do if they suspect it exists within our business, supply chain or communities.

Policy Detail

What is modern slavery?

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Treating someone as if they are owned property.
Servitude	Making someone provide services through force.
Forced or compulsory labour	Any work or services people are forced to do against their will under threat of violence or psychological control. Many are subjected to debt bondage.
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation.

In the UK, the most prevalent forms of modern slavery are forced labour and criminal exploitation. Globally, these rights are protected by the Universal Declaration of Human Rights and the International Labour Organisation Fundamental Conventions.

Modern slavery signs

The following signs are the most frequent indicators that someone may be being controlled:

Identity documents	The individual is not in possession of their own passport, identification or travel documents.
Actions	The individual is acting as though they are being instructed or coached by someone else.
Communication	The individual does not seem to be able to communicate freely and/or has limited social interaction.
Emotional appearance	The individual is withdrawn, anxious or they appear frightened.
Physical appearance	The individual's physical appearance may be consistent with abuse, including lack of access to sanitation, food or physical violence. They may have few personal possessions.
Movement	The individual is not allowed to travel alone and may be dropped off at and collected from work (either as a group or individually).

More information is available online.

Potential risks in Southern Co-op's business

Like any business, we rely on third party providers of goods and services so that we can operate and trade successfully and responsibly for the benefit of our members, customers and communities.

Approximately 90% of the products we sell in our food business are supplied by The Co-operative Group Limited ("Co-op Group") which has a robust procurement process in place to prevent modern slavery, which we should monitor to ensure its continued efficacy/effectiveness. We support the sale of Fairtrade products, sourced through Co-op Group, which help support better prices, decent working conditions and fair terms of trade for farmers and workers. Outside of this arrangement, we directly source the goods/services that we require (including our Local Flavours products) and need to be comfortable that we can identify any risk of modern slavery and deal with it.

In our Cobra Coffee Starbucks franchise business, we are required to use Starbuck's nominated suppliers which have been selected in accordance with their own ethical sourcing programme.

In End of Life Services, we use a number of providers of goods and services for both retail and non retail sale. Again, our policy is that we need to ensure we have processes in place to reduce the risk of modern slavery within this supply chain.

We also source goods and services not for retail (from colleague uniforms, cleaning services, technology goods, security services, hearses to electrical maintenance) from a variety of third party providers and through our supporting procedures, we need to remain vigilant for signs of modern slavery.

Internally, we must ensure that criminals are not using our recruitment processes to benefit from the work of individuals.

Our Responsibilities

Southern Co-op's responsibilities

As a Society, we will:

a) have in place a strategy to prevent modern slavery against which the Board will assess progress;

b) ensure we know our suppliers and clearly communicate our anti-slavery expectations in our commercial contracts;

c) establish and maintain a contract framework which seeks to identify any modern slavery risks; taking steps to avoid the incidence of modern slavery in our supply chains by having a robust due diligence process based on our decision making Compass;

d) ensure relevant colleagues understand the risks in relation to the contractual arrangements they are responsible for;

e) maintain clear policies and procedures which prevent exploitation of our colleagues;

f) ensure we continue to meet legal standards for the protection and welfare of colleagues;

g) have a transparent recruitment and on-boarding process that can identify and reduce the risk of exploitation;

h) ensure we make it easy for colleagues to report their concerns (including confidentially) via our Whistleblowing Procedure;

i) deal with any concerns raised confidentially (as appropriate), sensitively and with compassion through our processes;

j) seek to raise awareness of the issues so that our colleagues can recognise the signs of modern slavery;

k) provide a robust grievance policy to allow concerns to be raised by colleagues about work;

l) issue an annual statement (our "Modern Slavery Statement") setting out the steps we have taken to prevent modern slavery within our supply chain and business , reporting our progress to our stakeholders and others. ; and proactively but proportionately comply with recognised relevant good practice.

Reporting and Managing

Self reporting

All concerns will be taken seriously and treated sensitively. You can speak to your line manager or another trusted manager, speak to HR, use our Grievance Procedures (if it relates to a complaint about the workplace) or use our Whistleblowing Process which is confidential.

If you don't feel ready to take this step, there are also a number or organisations that work to give advice to victims of modern slavery. You can find further resources here:

www.modernslaveryhelpline.org
www.salvationarmy.org.uk
www.hampshire.police.uk

Reporting about someone else

If you suspect that someone is being exploited, and could be a victim of modern slavery, talking to someone about your concerns may stop someone from being abused. You should therefore report any suspicions as follows.

Never approach the suspected aggressor because this could put you and the victim at risk of harm. **Immediate concerns of safety:** if you believe that there is an immediate risk to a person's life or health call 999 without delay and report the concern to your line manager.

Raising concerns with your line manager: your line manager will obtain advice on the best course of action and provide any further advice. The best course of action will depend on whether the situation is related to a colleague, member, customer or supplier or other stakeholder.

Raising concerns confidentially: if you wish to raise your concerns confidentially, you can use our Whistleblowing Procedure

Dealing with reports as a line manager

Where a concern is raised, it should be dealt with sensitively and appropriately. Although it should be the aim to deal with concerns confidentially, this may not be possible in all situations, particularly where there is an immediate risk of harm.

You should contact the Director of Corporate Affairs who will advise you on the best way to progress the concerns raised.

Any grievance raising a complaint of exploitation will be handled independently following our Grievance Process.

Confidentiality and protection

Although it is Southern Co-op's aim to deal with concerns confidentially, this may not be possible in all situations, particularly where there is an immediate risk of harm or where you may be required as a witness. It may be necessary to obtain further information to help in any investigation so keeping our identity secret may hinder progress.

These principles will also be applied to any other stakeholder raising a genuine and legitimate breach of policy or suspicions of modern slavery under this policy.

Please see our Whistleblowing Policy for details of confidentiality and protection relating to the use of the Whistleblowing Procedure.

Monitoring our Procedures

We will review our Anti Modern Slavery Policy annually. We will provide information and/or training on any material changes we make.

Responsible (R)	Communication	Accountable (A)	Sustainability and Communication
Consult (C)	HR/ Corporate Affairs	Inform (I)	All colleagues
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Job Role Approval	Director Sustainability and Communications		