



# Modern Slavery & Ethics Policy Statement

## Introduction

This statement sets out British Gymnastics' commitment to understand all potential modern slavery and unethical risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery, human trafficking or other unethical practice in its business and its supply chains.

## Organisational structure and supply chains

This Policy Statement covers the activities of British Gymnastics, Gymnastics Enterprises Ltd (GEL) and the British Gymnastics Foundation:

- **British Gymnastics** is the Governing Body for the sport of gymnastics in the UK. British Gymnastics provides a national directive and structure for the sport; delivering a range of opportunities across the age spectrum including staging events, educating coaches, judges and other deliverers of gymnastics as well as developing talent and delivering top-level success. Suppliers of British Gymnastics range from leotard and equipment manufacturers to authors of education content, venues, recruitment services, printers, audio-visual companies and sponsors.
- **Gymnastics Enterprises Ltd (GEL)** is a commercial entity with a varied product range such as badges and certificates, branded clothing, stationery and gymnastics accessories. Most suppliers to GEL are UK based however their supply chains can have reach to countries in Europe and Asia.
- **British Gymnastics Foundation** is a registered charity which was set up by British Gymnastics in May 2014. It is a separate company from British Gymnastics and has its own Board of Trustees. The British Gymnastics Foundation exists to create opportunities through gymnastics, to bring real improvements to the lives of people and communities most in need. The Charity delivers its work all across the UK and has the following four focus areas for its public benefit work: disability, schools, hardship and community. More information can be found on the Charity's website: [www.britishgymnasticsfoundation.org](http://www.britishgymnasticsfoundation.org)

This Policy Statement includes all suppliers in connection with the above operations and their supply chains

## Responsibility

We seek to partner with suppliers that share our values and expect our supply chain to operate fair and equitable practices whereby Modern Slavery is not tolerated.

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Integrity Director is responsible for putting in place and reviewing policies for Modern Slavery and connected British Gymnastics Policies
- **Risk assessments:** All Managers are responsible for ensuring they have risk assessed the use of all current and new/ potential suppliers. This must include identifying any potential risks concerning the supplier or their supply chain and controlling any identified risks by ensuring all suppliers sign up to the British Gymnastics supplier [code of conduct and agreement](#).
- **Training:** Learning & Development are responsible for rolling out awareness training to all staff to enable them to better understand and respond to the identified slavery and human trafficking risks.

### Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery, human trafficking and unethical practice in its operations:

- **Whistleblowing policy.** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Employee code of conduct.** The organisation's code of conduct within the Staff Handbook makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct.** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour including the areas of Child Labour, Forced Labour, Compensation/ working hours, Discrimination, Health & Safety, General Data Protection Regulation and Product Liability. [Click here for supplier code of conduct](#)

Serious violations of the organisation's supplier code of conduct may lead to the termination of the business relationship.

- **Other relevant policies** include Health, Safety & Welfare Policy, Data Protection Policy, Staff Handbook, Equality & Diversity Policy, Complaints & Resolutions Policy, Whistleblowing Policy

### Due diligence

In general, British Gymnastics considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

The organisation will adopt the following due diligence process for existing suppliers and when considering taking on new suppliers:

- Requiring all current suppliers to adhere to and sign up to the British Gymnastics Supplier Code of Conduct confirming that they, and their supply chain do not endorse, enable or tolerate slavery, human trafficking and unethical practices;
- Amendment of British Gymnastics' on-boarding process for new suppliers to include an express obligation that compels all suppliers to comply with all Anti-Slavery and Anti-Human Trafficking legislation;
- Invoking sanctions against suppliers that fail to meet the required standards set out in the Supplier Code of Conduct, including the termination of the business relationship where required

### Awareness Training

- The organisation requires all Managers within the organisation to complete awareness training on Modern Slavery, Human Trafficking and unethical practice as a module within the organisation's Learning & Development programme.

### Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- requiring all managers to have completed an awareness training module on modern slavery, human trafficking and unethical practice by 31<sup>st</sup> March 2019;
- developing a system for supply chain verification expected to be in place by 1<sup>st</sup> September 2018, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chain expected to be completed by 1<sup>st</sup> September 2018, whereby the organisation evaluates all existing suppliers.

### Board approval

This statement has been approved by the organisation's Board of directors, who will review and update it in line with the British Gymnastics Policy Review process every 3 years.

Date 14th March 2018