



Policy:	Labour & Human Rights Policy		
Author / Owner:	People Team		
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Version Control			
Date:	Version:	Author:	What's changed:
14/12/2022	V1.1	T Lancaster	Added clauses so that we align with requirements of UK Government's Modern Slavery Assessment Tool
27/10/2022	V1	G Wheatley & T Lancaster	First draft created

1. Introduction

- 1.1. Colleague engagement, human rights and worker health and wellness is core to the long-term success of our business. We strive for a sustainable workforce that is stable, engaged and committed to the organisation, our goals and objectives. We respect and protect the rights of our people across operations and throughout our business relationships.
- 1.2. We are committed to ensuring that our colleagues are subject to fair working practices and are treated with respect. Within our business, the rights of our colleagues are respected by the implementation of this policy and our Code of Ethics.
- 1.3. Digital Space Group Limited policies and procedures are based on the following external declarations and practices:
 - 1.3.1. [The United Nations Declaration of Human Rights](#);
 - 1.3.2. [The International Labour Organisation's declaration on Fundamental Principles and Rights at Work](#)
 - 1.3.3. [The Living Wage Foundation](#).

2. Overview

- 2.1. The purpose of this policy is to define the labour and human rights standards to which all colleagues at Digital Space Group Limited are entitled.
- 2.2. This policy applies globally to the management, colleagues, and contract workers of Digital Space Group Limited and associated entities.

3. Responsibilities

It is the responsibility of all **line managers** to:

- Be familiar with this policy
- Be professional and supportive of colleagues



It is the responsibility of **colleagues** to:

- Be familiar with this policy
- Follow the procedure in terms of keeping the company informed

It is the responsibility of **the People Team** to:

- Maintain this policy and communicate any changes
- Provide advice & guidance
- Ensure that this policy and procedure is implemented effectively, in a consistent and fair manner

4. Requirements

4.1. Non-discrimination

4.1.1. The Company shall not accept any form of discrimination against our people on the basis of race, colour, gender, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, health status, age, disability, or other distinguishing characteristics. Employment-related decisions, from hiring to termination and retirement shall be based on relevant and objective criteria.

4.2. Forced Labour

4.2.1. The Company shall prohibit any form of forced labour, including bonded labour, indentured labour, slave labour, or human trafficking. Our people shall be allowed to move around freely and leave their place of work when their work shift ends, and shall be able to terminate their employment by choice and in line with the terms of the contract.

4.3. Child Labour

4.3.1. The Company shall not condone the hiring of child labour under any circumstances. The minimum age for full-time employment in 'regular work' shall be 16 years old or the legal minimum age for employment, whichever is greater. The Company shall refrain from hiring workers under the age of 18 years old for positions where 'hazardous work' is performed.

4.4. Freedom of association and collective bargaining

4.4.1. The Company shall respect colleagues' rights to form, not join or join a labour union or other organisation of their choice, and to bargain collectively in support of their mutual interests without fear of punitive actions such as intimidation, harassment or termination of employment. If no legally recognised union exists in the area of operations, The Company shall respond to initiatives to establish internal means for representing workers' interests (Colleague Forum).

4.5. Harassment

4.5.1. The Company shall protect workers from any acts of physical, verbal, sexual or psychological harassment, abuse or threats in the workplace by either their fellow colleagues or their managers.



4.6. Working Hours, Benefits & Remuneration

- 4.6.1. The Company shall ensure, as a minimum, it adheres to all applicable laws or industry standards, whichever may be more stringent, relating to remuneration, working hours, overtime and benefits. The Company aims to pay at or above the [UK Living Wage](#) although salaries are reviewed annually during pay review and recognise living wage rates could change at different points of the year. There is no requirement for our colleagues to work overtime, all overtime is voluntary.
- 4.6.2. In the event of termination of employment, the Company shall meet or exceed applicable laws and industry standards.

4.7. Career Development

- 4.7.1. The Company shall be committed to continuously developing colleague skills and capabilities, and to providing opportunities for career advancement.

4.8. Leave

- 4.8.1. The Company shall grant all colleagues the right to sick leave and annual holiday, as well as parental leave for colleagues who must care for a child or adopted child as provided by national legislation. Colleagues who take such leave shall not face dismissal or threat of dismissal, and subject to business conditions, shall be able to return to their former employment or equivalent employment on comparable terms of employment.

4.9. Colleague Contracts & Letters

- 4.9.1. All colleagues shall be provided with a written, understandable and legally binding contract/letter. The Company shall not rely on part-time, short-term or casual labourers, trainees or false apprenticeships to pay lower wages and offer fewer benefits. This relates to contracts and compliance and individual freelancers, contractors and consultants. The company shall not require colleagues to pay recruitment fees and shall not deal with agencies that require this.
- 4.9.2. The company shall require workers to present identification documents and relevant certificates but shall never take or hold original documentation.



5. Context

5.1. The table below shows how the Company’s existing policies and procedures support the requirements of the Labour & Human Rights Policy:

Digital Space Policy / Procedure	Support this requirement:	Comments
1-1 & Objectives Form	Career Development	Tool used to assess performance and ongoing objectives for career development.
Adoption Leave Policy & Procedure	Working Hours, Benefits & Remuneration Leave	Our policy outlines specific types of leave, benefits and process for our colleagues.
Annual Leave Policy & Procedure	Working Hours, Benefits & Remuneration Leave	Our policy outlines specific types of leave, benefits and process for our colleagues.
Anti-Slavery & Human Trafficking Statement	Non-discrimination Forced Labour	Our policy outlines how we safeguard our colleagues and external partners.
Capability Policies & Procedures	Non-discrimination	Process document for managing performance and capability fairly and effectively.
Colleague Forum	Non-discrimination Working Hours, Benefits & Remuneration Career Development Leave	Internal forum as representation for our colleagues and business initiatives.
Colleague Handbook	Non-discrimination Working Hours, Benefits & Remuneration Career Development Leave	Documentation outlining support, benefits and conduct for all colleagues.
Contract of Employment	Working Hours, Benefits & Remuneration	Colleague specified terms and conditions.



LABOUR & HUMAN RIGHTS POLICY

	Leave Colleague Contracts & Letters	
Disciplinary Policy & Procedure	Non-discrimination	Process document for managing conduct fairly and effectively.
Equality, Diversity & Inclusion Policy & Procedure	Non-discrimination	Our policy outlines how we safeguard our colleagues and external partners.
Expenses Policy	Working Hours, Benefits & Remuneration	Guide document for processing and claiming expenses.
Flexible Working Policy & Procedure	Working Hours, Benefits & Remuneration	Policy to ensure a fair, equal and effective flexible working process.
Grievance Procedure	Non-discrimination	Process document for managing complaints and concerns fairly and effectively.
Harassment Policy	Non-discrimination Harassment	Our policy outlines how we safeguard our colleagues and external partners.
Health & Safety Policy	Child Labour	Our policy outlines how we safeguard our colleagues and external partners.
Training Policy	Career Development	Policy to support performance and ongoing development needs for career development.
Maternity leave Policy & Procedure	Working Hours, Benefits & Remuneration Leave	Our policy outlines specific types of leave, benefits and process for our colleagues.
Other Authorised Leave Policy	Working Hours, Benefits & Remuneration Leave	Our policy outlines specific types of leave, benefits and process for our colleagues.
Overtime Guidelines	Working Hours, Benefits & Remuneration	Guide document for processing and claiming overtime.



Paternity policy & Procedure	Working Hours, Benefits & Remuneration Leave	Our policy outlines specific types of leave, benefits and process for our colleagues.
Recruiting the best, Guide for Hiring Managers	Non-discrimination	Guide document to ensure a fair, equal and effective recruitment process.
Shared Parental Leave Policy & Procedure	Working Hours, Benefits & Remuneration Leave	Our policy outlines specific types of leave, benefits and process for our colleagues.
Sickness Absence Policy & Procedure	Working Hours, Benefits & Remuneration Leave	Our policy outlines specific types of leave, benefits and process for our colleagues.
Whistleblowing Policy & Procedure	Non-discrimination Forced Labour Child Labour Working Hours, Benefits & Remuneration	Our policy outlines how we safeguard our colleagues and external partners.

6. Training

Training Module	Support	Comments
Anti-slavery	Non-discrimination Forced Labour	E-learning available to all colleagues
The 4 types of Discrimination	Non-discrimination	E-learning available to all colleagues
1-1 & Objective Setting	Career Development	Workshops scheduled on demand



7. Measurement & Reporting

Reporting type	Support this requirement:
Annual Anti-Slavery & Human Trafficking statement review and submission	Non-discrimination Forced Labour
Annual Gender Pay Gap reporting	Non-discrimination
Monthly review of Overtime spends and activity by department	Working Hours, Benefits & Remuneration
Onboarding process required signed contract of employment	Working Hours, Benefits & Remuneration Leave Colleague Contracts & Letters
Quarterly review of % of annual leave taken	Working Hours, Benefits & Remuneration Leave
Regular compliance review of the employment documentation in line with legislation updates	Working Hours, Benefits & Remuneration Leave Colleague Contracts & Letters
Regular training compliance review and follow up	Career Development
Track number of suspected slavery cases reported through Whistleblowing procedure	Non-discrimination Forced Labour
Tracking of active employee relations cased including grievances and disciplinary cases and any subsequent terminations	Non-discrimination
Tracking of completed training hours and study	Career Development
Tracking of sickness absence activity and assessment of return-to-work documentation	Working Hours, Benefits & Remuneration Leave



8. Policy Revision

- 8.1. This policy will be reviewed at least annually in the light of changes in international declarations and local laws.

9. Terms & Conditions

- 9.1. Where a colleague has any questions or queries in relation to the Labour & Human Rights Policy, they are encouraged to contact the People Team.