

Modern Slavery Act 2015 – [COMPANY]’s Modern Slavery and Human Trafficking Statement [YEAR/YEAR]

Introduction

[COMPANY] is committed to preventing slavery and human trafficking in our corporate activities and in our supply chain management.

This statement sets out [COMPANY]’s actions to understand all potential modern slavery risks related to our services and business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own services and business and our supply chains. This statement relates to actions and activities during the financial year **[DATE/YEAR/PERIOD]**.

Organisational Structure

[COMPANY] [ABOUT YOUR COMPANY AND ORGANISATIONAL STRUCTURE]

This statement is published in response to the Modern Slavery Act 2015.

Supply Chains

Our supply chains include: [BRIEF DETAILS OF SUPPLY CHAINS].

[ALTERNATIVELY YOU MAY WISH TO STATE THAT YOU INTEND TO CARRY OUT A SUPPLY CHAIN MAPPING PROCESS OR RISK ASSESSMENT/ANALYSIS IN RESPECT OF SUPPLY CHAINS]

Countries of operation and supply

[COMPANY] [BRIEF DETAILS ABOUT INTERNATIONAL OPERATIONS AND HOW COMPANY ENSURES COMPLIANCE WITH THE MODERN SLAVERY ACT 2015]

OR

[COMPANY] only operates within the United Kingdom. Whilst the risk of slavery and human trafficking is considered [LOW/MODERATE/HIGH] due to the nature of the [COMPANY]’s business, the [COMPANY] remains vigilant to any potential risks.

High risk activities [OPTIONAL]

The [COMPANY] considers that, due to the nature of its business and the policies/processes that are in operation, there are no areas of its business that are considered to be at high risk of slavery or human trafficking.

Responsibility

Responsibility for the [COMPANY]’s anti-slavery initiatives is as follows:

Policies: These are developed by officers/team in the relevant Service/Business

area and are agreed in line with the [COMPANY]’s scheme of delegation. Policies are reviewed to ensure that they remain relevant.

Risk assessments: These are undertaken by the relevant service/business area where there is deemed to be a risk of modern slavery or human trafficking, with support from colleagues in Human Resources and Organisational Development (HR&OD) or Board of Directors.

Investigations/due diligence: Any concerns regarding modern slavery or human trafficking should be raised with the [COMPANY]’s Board of Directors in the first instance.

Relevant policies

[COMPANY] reviews its policies and procedures on an on-going basis to ensure they remain compliant and fit for purpose. The following areas and procedures are considered to be key in meeting the requirements of the Modern Slavery Act:

Whistleblowing: The [COMPANY] encourages all its employees, consultants contractors, volunteers and workers to report any concerns related to its direct activities, or the supply chains of the [COMPANY]. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The [COMPANY]’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. [LINK TO RELEVANT DOCUMENT IF AVAILABLE]

Employer and Employee Responsibilities Code: The [COMPANY] makes clear to our 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 in all its operations and when managing our supply chain. [LINK TO RELEVANT DOCUMENT IF AVAILABLE]

Recruitment: The [COMPANY]’s recruitment processes are transparent and reviewed regularly. They include robust procedures for [“vetting” is applicable] new employees, which ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate personal bank account. All prospective employees are asked to supply evidence of their eligibility to work in the UK. [“References are also requested and followed up”. IF APPLICABLE]

Agency Workers [IF APPLICABLE]: The [COMPANY] uses employment agencies to source additional workforce capacity. Where agency workers are required these are primarily engaged through the [COMPANY]’s managed service provider.

Expectations of suppliers: The [COMPANY] 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 respect and dignity and act ethically and within the law in workforce matters.

[OPTIONAL] The [COMPANY] has a dedicated procurement website and our supplier guidance contains a “Supplier Checklist.” [LINK TO RELEVANT DOCUMENT IF AVAILABLE].

Due diligence

The [COMPANY] requires its contractors and suppliers to demonstrate their commitment to supporting human rights within their supply chain relating to, for example, child labour, forced labour, health and safety and working hours. The [COMPANY] undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers.

This is the responsibility of the particular [COMPANY] contracting managers [“with the support of the COMPANY’s Procurement Team” IF APPLICABLE]. The [COMPANY]’s due diligence measures in place include:

- the implementation of measures in the evaluation of suppliers to enable the exclusion of suppliers with convictions under the relevant sections of the Modern Slavery Act.
- clarity that if a supplier misrepresents any information, that the supplier may be excluded from the procurement process and from bidding for other contracts in the future. If information comes to light after a contract has been entered into, that supplier may be sued for damages and the contract rescinded.
- a review of contract terms and conditions and appropriate clauses for inclusion to ensure compliance with the Modern Slavery Act. Such terms and conditions are also applicable to sub-contractors in the supply chain.
- embedding a county wide approach to contract management to consider any potential risk of slavery as it relates to each contract, and through active contract management to more effectively ensure that slavery and human trafficking is not taking place in the supply chain.

Training

In the financial year [LAST YEAR/PERIOD] training on modern slavery and human trafficking has been delivered to staff and the supply chains.

In this financial year the [COMPANY] also plans to develop and roll out a training [“e-learning” IF APPLICABLE] package to raise awareness of modern slavery and trafficking amongst all employees and workers.

Approval for this Statement

This statement has been approved by the [ROLE] of the [COMPANY], [NAME]. It will continue to be reviewed and provided annually.

Signature:

Date:

[COMPANY NAME]