# **Modern Slavery & Human Trafficking Policy**

## **BACKGROUND**

On March 26, 2015, The Modern Slavery Act 2015 was passed into law in the United Kingdom. This law requires all business entities that carry on a business, or part of a business, in any part of the United Kingdom to prepare and publish a slavery and human trafficking statement for each financial year of the organization. The law also creates the obligation to report on steps taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of its supply chain or in any part of its own business. Style Acre is a charity which has business entities operating in the UK, therefore Style Acre abides by this law.

## **SCOPE**

This policy applies to Style Acre's business operations. Employees whose responsibilities relate to the recruitment of employees and volunteers, and any additional sourcing of goods and services for the business are informed and are expected to assist our compliance with these requirements, associated legislation, and regulations. This policy is reviewed annually, and changes are incorporated accordingly.

## **OUR COMMITMENT**

Style Acre is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we value diversity and are strongly committed to creating and ensuring a non-discriminatory and respectful working environment for our staff and volunteers. We want all our staff and volunteers to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

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We are also committed to taking steps to ensure that slavery and human trafficking is not taking place in any part of our Organisation.

## **OUR EXPECTATIONS**

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our organisation.

We remain committed to having systems in place to safeguard against forced labour in any part of our business or our supply chains and we do not tolerate forced labour either within our business itself or within our supply chains. We expect our suppliers (whether direct suppliers or those that directly or indirectly supply our direct suppliers) to share the same values.

We will continue to review our business and our supply chains to fully understand the risks that we face in relation to forced labour.

We continue to take the following steps to assess and manage any risk that our supply chains may use forced labour:

- we expect our suppliers to comply with their obligations under the Modern Slavery Act 2015 and to place similar expectations on their respective suppliers;
- when entering into arrangements with suppliers, we may ask our suppliers to complete a self-assessment questionnaire which allows us to assess their business, so that we are alert for any indicators of forced labour;
- we maintain communication and personal contact with our suppliers to ensure they understand our expectations;
- we incorporate relevant contractual obligations into our supplier contracts, such that our suppliers will:
  - o undertake to comply with the Modern Slavery Act 2015;
  - warrant that their business and, to the best of their knowledge, their own supply chain do not use forced labour;
  - agree to permit us and third parties acting for us to inspect their facilities, records and practices to audit their business for the purposes of ensuring that they comply with these obligations and that there is no use of forced labour; and
  - impose equivalent obligations on their own suppliers, such that a failure to adhere with such terms may ultimately result in termination of the contract entered into with that supplier;

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- the contractual terms we enter into with our suppliers are regularly reviewed;
   and
- we shall review statements published by our suppliers on the use of forced labour to ensure that they in turn are taking what appears to us to be appropriate steps.
- All work must be voluntary, and workers shall be free to terminate their employment and leave work at any time.
- As part of the hiring process for workers employed within Style Acre's supply
  chains the organisation view it as best practice for workers sourced from outside
  of the UK for the purposes of sponsorship, are provided with a written
  employment agreement in their native language. This should contain a
  description of terms and conditions of employment and if relevant, the
  description of any hazardous nature of the work, prior to the worker departing
  from their country of origin.
- Workers must not be required to pay employers' or agents' recruitment fees or
  other related fees for their employment. If any such fees are found to have been
  paid by workers, such fees must be repaid to the worker.

## REPORTING CONCERNS

We have in place an employee 'Whistleblowing Policy', that encourages employees to report any concerns in relation to behaviours that may be contrary to Style Acre's statutory obligations. This policy encourages our employees to report their concerns and aims to provide an environment where our employees feel able and safe to raise such concerns. Style Acre will take the appropriate measures to address those concerns wherever possible.

For individuals wishing to address any concerns or communicate any potential issues regarding Style Acre's supply chain, please contact <u>info@styleacre.org.uk</u>, for attention of either Chris Ingram (CEO) or Becky Speight (Operations Director).

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