



Policy Name	<b>Modern Slavery Act Statement 2015</b>
Policy Version	
Department / Area	H.R. Department / Learner Services
Created By	Head of Policies
Amended By	J. Townsend
Approved by SLT	
<b>Date updated</b>	June 2023
Next Review	June 2024
Document REF	M/Sla
Category	Staff/Learner
Covers	Staff / Learner / Both

This statement sets out Heart & Soul Community CIC actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and, its supply chains.

This statement recognises that an independent review<sup>1</sup> has been undertaken of Modern Slavery Act 2015 and has considered the government's responses to this review in its statement for 2022/2023.

As part of Local Government, Heart & Soul Community CIC recognises that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to the responsibility as an employer, it also acknowledges its duty as a Training Provider to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by Section 54 of the Modern Slavery Act 2015.

Heart & Soul Community CIC has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our business**

Heart & Soul Community CIC is a Not-for-Profit Organisation, we are based in Salop Street Wolverhampton West Midlands. We offer Training courses to unemployed customers.

### **Our high-risk areas**

We will work with our principal suppliers to ensure that our approach to slavery and human trafficking is reflected in all our purchases of goods and services so that neither we nor they are involved in any way, either directly or indirectly, in slavery and human trafficking.

### **Our policies**

The Heart & Soul Community CIC is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking. This is managed by:



1. Participating in a working group for the Local Government Association's modern slavery assurance guidance document. This assists local authorities in addressing modern slavery issues within construction procurements and supply chains.
  2. Dedicated team briefs to all service delivery areas refreshing officer knowledge of modern slavery within the procurement documents, officer obligations and how to capture modern slavery data.
  3. Organisational e-learning modules to help officers recognise the signs and whistle blow to prevent this hidden crime. This is also part of the new entrant training.
  4. Promoting modern slavery awareness to officers around Anti-Slavery Day on 18<sup>th</sup> October 2022.
  5. Officers understanding the National Referral Mechanism and working with partners when this is indicated.
  6. Undertaken a refresh of all current suppliers on the Heart & Soul Community CIC's Contracts Register, reviewing the organisations modern slavery statements and ensuring all applicable suppliers have a current statement in accordance with their obligations.
  7. Officers will use the Heart & Soul Community CIC's modern slavery guidance and tender documentation to ensure due diligence is undertaken prior to engaging suppliers in any goods, services or works.
  8. When procuring goods or services, officers will ensure that as part of tender evaluation and ongoing contract management, they will consider the potential and likelihood of modern slavery through a clear understanding of the supplier's:
    - Structure, business and supply chains;
- Policies in relation to slavery and human trafficking;

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the Heart & Soul Community CIC's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as Heart & Soul Community CIC and how we expect our employees and suppliers to act.

## **Our suppliers**

Heart & Soul Community CIC operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular Heart & Soul Community CIC has never been convicted of offenses relating to modern slavery [and on-site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.



In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

<https://www.gov.uk/government/consultations/transparency-in-supply-chains>

<https://www.gov.uk/government/publications/government-response-to-the-independent-review-of-the-modern-slavery-act>

### **Training**

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

[Insert here any relevant performance indicators, for example

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.]

Signed:

Director Jayne Townsend

2<sup>nd</sup> June 2023