

# GROUNDWORK

CHANGING PLACES

CHANGING LIVES



Ref: HR 37-00

## Modern Slavery Statement & Policy

This Statement & Policy applies to all Groundwork NE & Cumbria Staff / Trustees / Volunteers / Consultants / Placements as well as any Trading Subsidiaries and Suppliers.

Developed By:	<u>Director of Finance &amp; Resources / Head of HR</u>
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This policy is reviewed on an annual basis to ensure its continued suitability

## Modern Slavery and Human Trafficking Statement

Groundwork 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, Groundwork is committed to creating and ensuring a non-discriminatory and respectful working environment for its staff. Groundwork wants all its staff to feel confident that they can expose wrongdoing without any risk to themselves.

Groundwork's 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 once in our employment.

Groundwork does not enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. Groundwork is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and or similar human rights abuses.

We are also committed to ensuring our approach to tackling modern slavery in our own organisation and throughout our supply chains is consistent with our disclosure obligations under the Modern Slavery Act 2015. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

This statement sets out Groundwork's actions to understand all potential modern slavery risks related to the business and to ensure steps are maintained to prevent both slavery and human trafficking.

Groundwork is a charity working locally and nationally to transform lives in the UK's most disadvantaged communities. We're passionate about creating a future where every neighbourhood is vibrant and green, every community is strong and able to shape its own destiny and no-one is held back by their background or circumstances. We help people gain confidence and skills, get into training and work, protect and improve green spaces, lead more active lives and overcome significant challenges such as poverty, isolation, low skills and poor health.

Groundwork NE & Cumbria covers the geographical areas of Northumberland, Tyne & Wear, County Durham, Tees Valley and Cumbria. The organisation of the Trusts has been created to allow us to help as many people in our areas benefit from our unique and holistic approach to social and environmental regeneration.

Groundwork's Modern Slavery Policy, along with our Anti-Bribery and Whistle-blowing policies reflect our commitment to acting ethically and with integrity in all our business relationships.

Groundwork's Safeguarding Policy and Procedures acknowledges modern slavery as a form of abuse and, where there is a concern about a child (under 18 years) or an adult (18 or over) who needs care and support, this Policy takes effect.

In order to assess the risk of modern slavery, we use the following processes:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains.
  - Review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.
  - As a pre-condition to supplying Groundwork, suppliers must confirm their compliance with the Act. If a supplier fails to provide the information requested or meet our expectations, Groundwork will take appropriate action, which may include not entering into a relationship or terminating the relationship.
  - Protect whistle blowers.
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To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business our Modern Slavery Policy Statement is included in our Employee Handbook.

Training on Modern Slavery is also available for our staff.

## Anti-Slavery and Human Trafficking Policy

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of this process, we have undertaken a review of our supply chain to identify and assess potential risk areas and maintain a register detailing the same.

We expect high standards from all of our subcontractors, suppliers and other business partners and have made this a contractual term in our agreements with significant suppliers wherever possible.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## Responsibilities

The senior management of the organisation has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all of our people comply with it.

The Finance & Corporate Services department has primary and day-to-day responsibility for implementing this policy, but those in other roles involved in procurement should assist with reviewing the risk profile of our supply chain to ensure that any procedures implemented are effective in countering modern slavery.

## Compliance

All employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager, the Director of Finance & Corporate Services or Human Resources as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our organisation or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager/Director of Finance & Corporate Services/Human Resources, or report it in accordance with our Whistleblowing Policy as soon as possible

Groundwork encourages openness and will support anyone who raises genuine concerns in good faith in accordance with the organisation's whistleblowing policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their knowledge, or suspicion, that modern slavery is taking place in any part of our organisation or in any of our supply chains.

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## **Communication and Awareness**

Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organisation, we provide training to relevant members of staff.

## **Breaches**

Any employee who breaches this policy could be subject disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.