



Modern Slavery & Human Trafficking Statement 2024 - 2025

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Created By	Head of Policies
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1. 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 review¹ has been undertaken of Modern Slavery Act 2015 and has considered the government's responses to this review in its statement for 2024/2025.

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.

2. Our Organisation

Heart & Soul Community CIC is a Not-for-Profit Organisation, we are based 88-89 High Street Wordsley Stourbridge West Midlands. We offer Training courses to unemployed customers.

We work across the West Midlands offering outstanding opportunities for 16–18-year-old students, 19 years plus learners to access high-quality teaching and learning courses.

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.

3. Our Policy on Slavery and Human Trafficking

3.1 Heart & Soul Community CIC considers that Modern Slavery Encompasses: -

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanized, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.



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3.2 Heart & Soul Community CIC acknowledges its responsibilities in relation to tackling modern slavery and is committed to acquiring goods and services for its use without causing harm to others. We will make reasonable endeavors to ensure all employees and agents within our supply chains are not subject to any form of forced, compulsory or bonded labour or human trafficking and that they are paid in line with the national minimum wage.

3.3 All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the Senior Leadership Team taking responsibility for overall compliance. Heart & Soul Community CIC provide appropriate training and processes to effectively implement its stance on modern slavery.

3.4 The following Policies and Procedures support the organisations compliance with the Act:

- Equality & Diversity Policy
- Grievance Policy
- Whistleblowing Policy
- Anti-bribery Policy

4. RECRUITMENT PRACTICES

Where temporary staff are recruited indirectly by the Heart & Soul Community CIC this is done so through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, Heart & Soul Community CIC conducts checks on such agencies before they are approved.

Through its recruitment processes, Heart & Soul Community CIC ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

5. OUR SUPPLY CHAINS

We have zero tolerance to slavery and human trafficking. We expect all of our supply chain and contractors comply with our values.

As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our services, we will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors)

These processes will be subject to on-going assessment and reviews.

In our supply chains, Heart & Soul Community has identified the following business areas carrying materials risk of modern slavery occurring:



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- Security Services
- Catering Services
- Construction
- Cleaning
- Stationery and office equipment
- Uniforms and work wear
- Estates/facilities management and maintenance

When procuring any types of goods or services, as part of corporate social responsibility, Heart & Soul Community CIC requires all potential third-party suppliers to confirm that they are compliant with their statutory obligations related to equality and antidiscrimination during any tendering and selection process. This required declaration includes, but is not limited to, compliance to the Modern Slavery Act 2015.

Tendering and Selection processes that involve third party suppliers carrying material risk must evidence operation of an appropriate level of corporate social responsibility in addition to confirming compliance.

Any supplier or potential supplier identified as not complying with the Modern Slavery Act 2015, or our own policies and procedures, will be removed from our list of suppliers and will not be considered for future supply to the Heart & Soul Community CIC unless they can demonstrate that these compliance requirements are met.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

This statement will be made available to all staff members, stakeholders and the general public by publication on our website. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

This statement has been approved by the Director of Heart & Soul Community CIC and will be reviewed at least every year.

A rectangular box containing a handwritten signature in black ink. The signature appears to read "J. B. Townsend".

Jayne Townsend
Director April 2024