

## **SIMON ON THE STREETS ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Introduction**

In SOTS, we are committed to improving our practices to combat slavery and human trafficking. Modern slavery and human trafficking is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Clearly our operational teams are fully aware of modern slavery and human trafficking and they consider such offences each and every time they meet a new service user, however, as an organisation, our responsibilities in this area are much wider.

Simon on the Streets (SOTS) has a zero-tolerance approach to modern slavery and human trafficking and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our own business or in any of our suppliers.

SOTS is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

### **Organisation's structure**

SOTS is compact organisation operating across West Yorkshire. Based in Leeds, we operate three outreach teams in Leeds, Bradford and Huddersfield

Our work is principally involved in the following areas:

- ♣ Outreach support for entrenched rough sleepers
- ♣ Raising awareness of the plight of rough sleepers
- ♣ Raising funds and charitable donations within the United Kingdom

### **Our supply chains**

We procure a wide variety of goods and services, from networks and IT services to stationery and consultancy. Some of these products and services we use in our own business (like waste disposal services and stationery) and some we use as part of our support to our service users and supporters (like bespoke IT software platforms).

A number of suppliers sell to us, some directly and others via online sales. On top of that, many of our suppliers have their own suppliers. Therefore, our supply chain is relatively large and complex. So, we prioritise attention on companies that supply high value products or services, or things without which our business couldn't run.

## **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk, we have in place systems to:

- ♣ Identify and assess potential risk areas in our supply chains.
- ♣ Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- ♣ Monitor potential risk areas in our supply chains.
- ♣ Encourage whistleblowing and protect whistleblowers.

## **Supplier adherence to our values**

We have zero tolerance to modern slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we now have in place for new contracts a requirement that clearly set out a requirement that suppliers and their sub-contractors must adhere to the Modern Slavery Act 2015 and that the contract may be terminated if there is a breach of this requirement.

When we on-board new suppliers, we have a rigorous due diligence process that includes:

- ♣ If appropriate and feasible, undertaking references from supplier's current customers.
- ♣ If appropriate and feasible, undertaking site visits, and
- ♣ Requiring confirmation that suppliers adhere to all appropriate legislation, including but not limited to the Modern Slavery Act 2015.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we require our staff to be familiar with our Anti-slavery and Human Trafficking Policy and we provide periodic briefings, both face to face and written, to our staff. Human Resources 3 Anti-Slavery and Human Trafficking Statement September 2017

## **Our effectiveness in combating slavery and human trafficking**

To ensure we are effective in combating slavery and human trafficking, we have:

- ♣ Implemented a policy to ensure our staff are vigilant to the potential threat of slavery and human trafficking.
- ♣ Communicated our policy to staff.
- ♣ In place a confidential whistleblowing service for our staff to use if they suspect slavery or human trafficking is taking place in our supply chains.

## **We monitor all whistleblowing reports.**

In the last year, we have received no whistleblowing occurrences relating to modern slavery or human trafficking.

## **Further steps**

Following a review of the effectiveness of the steps we will take this year, to ensure that there is no slavery or human trafficking in our supply chains, we intend to complete the following steps to combat slavery and human trafficking:

- ♣ Write to all our key suppliers requesting that they confirm that they agree to abide to be bound by the Modern Slavery Act 2015 and that they have appropriate Modern Slavery policies in place within their organisation to ensure that they do so.
- ♣ Establish a full directory of all our suppliers to enable timely communication and effective monitoring.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes SOTS's slavery and human trafficking statement for our operating year ending 31 December 2018.