

# Modern day slavery statement

12 July 2024

As a values-led organisation guided by a strong sense of fairness, transparency and accountability, we are fully committed to preventing acts of modern slavery occurring within our business and partnerships, in line with the specific guidance under the [Modern Slavery Act 2015](https://www.legislation.gov.uk/ukpga/2015/30/contents) [<https://www.legislation.gov.uk/ukpga/2015/30/contents>].(the Act).

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime and includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after (i.e. human trafficking).

Through this statement (relating to the financial year ending 31 October 2023), we outline the approach we have taken to prevent such practices within our organisation and supply chains. Our approach covers regularly reviewing our risk areas and the control measures which underpin our relationships (internal and external) and operations to make sure that they align with our values and public responsibility. This, in turn, ensures that we conform with the Act.

We are further aware that recent changes in the economy and the general cost of living can increase the opportunities for exploitation of individuals and services in the economy (through seeking work or cheaper products).

## Areas of risk

As part of our ongoing commitment to preventing modern slavery, it is important for us to regularly reflect on and assess the likelihood of our exposure to modern slavery. Most of our business activities do not include high-risk activities. For example, production or sourcing outside of the United Kingdom or the European Union or forming partnerships with unverified or unknown organisations whose practices we are unaware of.

Due to the nature of our work, we consider there to be a low inherent risk of modern slavery in our business. Needless to say, we take our responsibility to act in scenarios where such a threat does exist seriously, and we will act immediately upon any identified threats. We are committed to improving our practices to combat modern slavery in our business and supply chains.

## Procurement

It is a priority for us to obtain the best quality and value goods, works and services which meet the organisation's criteria for policy, performance, risk and cost constraints. However, when it comes to value in investment, we do not look solely at cost, but we take into account factors such as risk and equality, consequently highlighting any susceptibility to exploitation.

Specific controls exist to highlight any inconsistencies with our own practices and values during the vetting and tendering process of a new supplier, as well as during the course of a supplier's contract. These include continuing to review and update our supplier questionnaire to make sure all those in our supply chain and contractors comply with our values and practices. Any external party wishing to engage with us must complete this questionnaire, declaring their processes and policies in relation to applicable regulations and therefore reducing the risk that their work practices and values do not align with our own.

We will continue to embed the importance of the Act into our procurement practices, checking that relevant suppliers and contractors understand their obligations under the Act and are committed to complying with the requirements it places on them. We will include these checks as part of our security auditing process.

## **Training and awareness**

We make sure that individuals who, within the remit of their roles, are more likely to be exposed to modern slavery risks, and make sure they have the necessary understanding and ability to identify and escalate such matters.

We do this by providing training to our staff. For example, all staff are expected to have an awareness and working knowledge of our relevant policies, including our Anti-Bribery and Corruption, Procurement and Whistleblowing policies.

## **Reporting mechanisms**

If an individual in our organisation genuinely suspects criminal conduct, or a breach of a legal, regulatory or professional obligation carried out by another individual in the SRA or by an individual in any of the organisations with which the SRA works, our Whistleblowing Policy has a mechanism to allow them to report this. This policy includes instances of modern slavery.

We thoroughly investigate reports and take appropriate action where necessary. The reporting process is confidential. We monitor compliance with this policy and we will also report matters to our Audit and Risk Committee.

## **Monitoring and review**

We are committed to:

- Continuously monitoring our practices and supply chains to ensure compliance with our commitment to tackle modern slavery
- aiming to always improve and make our training and policy materials inclusive of efforts to combat modern slavery
- monitoring the effectiveness of the actions we are taking to combat modern slavery in our business and in our supply chains
- raising awareness and building on this work in the future
- developing our practices in a constantly changing environment to combat modern slavery.