# Modern Slavery Policy

## The Charity

This statement applies to City Catering Southampton (referred to in this statement as 'the Charity). Modern slavery is 'a hidden crime that encompasses slavery, servitude, forced labour and human trafficking'. We take zero tolerance approach to this and are strongly committed to playing our part in eradicating modern slavery. We understand the importance of transparency within our supply chain in driving collaborative action and the potential impact of the Act on reducing risks and incidents of slavery.

The information included in the statement refers to the financial year ending in April 2023.

## **Charity Structure**

City Catering Southampton provide meals for schools at approx. 40 school units, provide meals for vulnerable people living locally in Southampton within the Community and also provide a corporate catering service. The Charity is led and managed by a Chief Executive Officer.

We currently employ around 250 personnel over 42 units supporting our cooking provisions, facilities and delivery to consumer requirements. Our Charity, Workforce and Senior Managers are all committed to the prevention of, and complete eradication of modern slavery, and are also committed to working in partnership with our suppliers and service providers to do the same.

#### **Definitions**

The Charity 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 dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restrictions placed on freedom of movement.

#### **Our Commitment**

The Charity acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015.

The Charity does not enter into business with any organisation in the United Kingdom or abroad that knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Charity in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Charity strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation and in many cases exceeds those minimums in relation to its employees.

### **Potential Risk of Exposure**

In general, the Charity considers its exposure to slavery / human trafficking to be relatively limited. However, it has taken steps to ensure that such practices do not take place within our business.

The Company's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

### Steps We Take

The Charity carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its Company.

The Charity has not, to its knowledge, conducted any business with another Charity which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Charity has taken the following steps to ensure that modern slavery is not taking place:

- Commitment to a zero-tolerance policy toward modern slavery
- We will undertake Anti-Modern Slavery Training in 2022. This will be completed through Learning Pool.
- HR documentation checks and awareness of potential flags that may identify concerns
- Ensuring Recruitment Agencies provide their Modern Slavery policy in advance of agreements
- Supplier contracts include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery

 Whistleblowing Procedure and Modern Slavery information provided at all sites and visible to staff

### **Policies**

The Charity has the following policies which further provide information to ensure awareness and to permit any concerns to be raised:

Modern slavery policy

- Supplier code of conduct
- Recruitment policy
- Whistleblowing Policy
- Grievance Policy

# Compliance

The Charity has a recognised HR Department, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Company's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.