



Modern Slavery and Human Trafficking Statement

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Company Definitions:**STEPS TO WORK**

The company is a charitable company limited by guarantee with its registered office being Townend House, Floor 6, Park Street, Walsall, WS1 1NS.

STARTING POINT RECRUITMENT Ltd

The company is a company limited by shares owned by Steps to Work with its registered office being Townend House, Floor 6, Park Street, Walsall, WS1 1NS.

Throughout this document Steps to Work is named to encompass all actions undertaken by Steps to Work / Starting Point Recruitment Limited.

Our Mission

To create opportunities and change futures by forging connections between local people and businesses.

Our Vision

To help people, many of whom face multiple barriers, find sustainable rewarding and meaningful jobs.

Our Values

Continuous Improvement, Client Focus, Innovation & Entrepreneurship, Cost Consciousness, Relentless Achievement, Relationship Orientation, Managed Risk

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Modern Slavery and Human Trafficking Statement

1. Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Steps to Work / Starting Point Recruitment Ltd to prevent modern slavery and human trafficking in its business and supply chains.

We are proud of the conditions of employment for all our employees throughout Steps to Work / Starting Point Recruitment. Given the nature of our business, the senior leadership team considers that there is minimal risk of Steps to Work / Starting Point Recruitment or our supply chains being in any way involved or complicit in slavery and human trafficking.

The employment and procurement practices operated by the businesses within Steps to Work / Starting Point Recruitment ensure that we are rightly viewed as an excellent and supportive employer and to the extent that our organisation operates as a purchaser of goods or services, we expect a high level of ethical conduct from those businesses with which we do business within our supply chain.

2. Organisation Structure

Steps to Work / Starting Point Recruitment is an employment and training provider since 1999.

Steps to Work / Starting Point Recruitment Limited is a registered charity (1100403). We provide training, advice, and assistance to help people into work no matter their background, experience or skill level.

We work with both employers and job seekers to increase employment opportunities in the Black Country.

Steps to Work / Starting Point Recruitment supports customers to prepare for work and make the most of their skills and abilities. We offer a variety of services including:

- Information, advice and guidance on careers and skills
- Training to help with well-being, confidence building and motivation etc
- CV writing support and guidance
- Job search support
- Support with interview preparation
- Public internet access for job search and training activities
- Information advice and guidance on training and education opportunities
- Support to develop new skills

3. Our Supply Chain

Our supply chain enables us to help more people into work. Our partners are established public and private sector organisations that help us to deliver and maintain high quality job coaching, recruitment, and skills development services. The aim of our partnerships is to join forces and expertise in offering a service that can seamlessly fulfil the needs and requirements of jobseekers, employers and skills learners alike. We work with a variety of established partners who are committed to the same high standards. This is validated through our due diligence processes and for those organisations that meet the threshold of obligations under the section 54 (1) of the Modern Slavery Act 2015 we will support our partners to understand those obligations and statutory duties.

4. Anti-Slavery Policy Statement

Modern slavery 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 to exploit them for personal or commercial gain.

Steps to Work / Starting Point Recruitment has a zero-tolerance approach to modern slavery, 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 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 within Steps to Work / Starting Point Recruitment and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will 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.

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, volunteers, 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.

5. Responsibility for the policy

Steps to Work / Starting Point Recruitment has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Steps to Work / Starting Point Recruitment has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Managing Director.

6. Compliance with the policy

You must ensure that you 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 line manager OR a company Director 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 or suspicion of modern slavery in any parts of our business or 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 line manager or company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply.

Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on Ciphre.

7. Due Diligence and Implementation Processes

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures appropriate to the different sectors of Steps to Work / Starting Point Recruitment. These include the policies and procedures in the following areas:

- Anti-Fraud and Corruption Policy
- Financial Regulations
- Whistle-blowing Policy
- Grievance Policy
- Safeguarding Policy
- Recruitment Policy
- Safeguarding Policy
- Equality & Diversity Policy

Steps to Work / Starting Point Recruitment also articulates a series of employee rights and benefits available to employees during the employee Inductions and Welcome Events and individual contracts of employment for each member of staff.

Steps to Work / Starting Point Recruitment operates a HR team led by the HR Manager and a Quality department led by the Head of Corporate Services. The company's Senior Leadership Team has reviewed and agreed to the term of this statement. A combination of procedures and functions operates to help identify, assess and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chain.

8. Communication & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

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

9. Legal and Regulatory Purpose of this Statement

This statement is made with regards to the obligations arising under section 54 (1) of the UK's Modern Slavery Act 2015 (the Act). Accordingly, this statement should be considered to constitute the slavery and human trafficking statement for Steps to Work / Starting Point Recruitment for the 2022 financial year and all future financial years until it may in future be modified or amended.