



## SCT Modern Slavery and Human Trafficking Statement

### 1. Introduction

- 1.1 This statement sets out the Sheffield City Trust Group, (SCT Group) commitment to understand the potential modern slavery risks related to their activities and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in their own activities and in their supply chains. This statement relates to actions and activities during the financial years 1 April 2021 to 31 March 2022.
- 1.2 SCT Group is committed to preventing slavery and human trafficking in their activities, and to ensuring that supply chains are free from slavery and human trafficking.

#### Definition of modern slavery

- 1.4 Modern slavery includes a range of types of exploitation, many of which occur together. These include but are not limited to:
  - Sexual exploitation: 42% of all reported trafficking victims in the UK are victims of sexual exploitation. This includes sexual abuse, forced prostitution and the abuse of children for the production of child abuse images/videos.
  - Domestic servitude: this involves victims being forced to work in usually private households, performing domestic chores and childcare duties. 24% of reported victims in the UK are children.
  - Forced labour: This can happen in various industries, including construction, manufacturing, hospitality, food packaging, agriculture, maritime and beauty (e.g. nail bars). One fifth of all reported forced labour victims are children – an increase of 24% since 2012. Three quarters of all reported forced labour victims are male.
  - Criminal exploitation: This can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shop-lifting, cannabis cultivation, drug trafficking and other similar activities that are subject to criminal penalties and imply financial gain for the trafficker.
  - Other forms of exploitation include organ removal, forced begging fraud, marriage and illegal adoption.

### 2. Organisational Structure and Supply Chains

- 2.1 This statement covers the activities of the SCT Group, which operates Leisure & Entertainment facilities in Sheffield, Derbyshire and North East Yorkshire.
- 2.2 SCT will conduct dynamic risk assessment of its activities in assessing whether particular activities are high risk in relation to slavery or human trafficking. Any concerns would be raised initially with the manager responsible for Safeguarding.

#### High-risk activities April 1/2021 – March 31/2022

- 2.4 SCT Group considers it has no activities at high risk of slavery or human trafficking.

#### Responsibility

- 2.5 Responsibility for the organisation's anti-slavery initiatives lie with the Chief Executive Officer, the Senior Leadership Team and the Safeguarding Lead all of whom are listed below.



<u>Chief Executive</u> Andrew Snelling	<u>Senior Leadership Team</u> Andrew Snelling - Chief Executive Officer Paul Hudson - Head of Sport & Leisure Dominic Stokes - Head of SCTLive Wendy Anderson – Interim Head of Finance Mandy Parker - Head of People & Service Delivery Stuart Ridley - Head of Marketing, Sales & ICT	<u>Safeguarding Lead</u> Mandy Parker
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### 3. Relevant Policies

3.1 SCT Group operates the following policies and processes that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- **Whistleblowing policy** – SCT Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employees' Conduct** – SCT Group makes it clear to employees the actions and behaviour expected of them when representing the organisation. SCT group strive to maintain the highest standards of employee conduct and ethical behaviour when managing the supply chain.
- **Ethical Standards** – SCT Group embraces principled and virtuous Core Values, which are embedded throughout the organisation. Through our people and practices these values are evident, partners and suppliers are expected and encouraged to adopt a similar approach.
- **Supplier Selection** - SCT Group does not consider that it operates in high risk sectors or locations because of the nature of its business and of the goods being acquired. SCT Group seek to ensure that our major suppliers adhere to our ethical standards and where required, those suppliers have adopted an Anti-Slavery Statement.
- **Recruitment/Agency workers policy** – SCT Group will use only specified, reputable employment agencies to source labour if required. New employees are thoroughly and properly vetted for their eligibility to work in the UK in accordance with Home Office and Cabinet Office security guidelines as appropriate.
- **Safeguarding children and vulnerable adults' policy**. SCT Group safeguarding policy sets out its duty to identify signs of potential abuse amongst children and vulnerable adults, which may include signs of trafficking or modern slavery.

### 4. Training

4.1 SCT Group will, where appropriate, educate its staff to recognise the risks of modern slavery and human trafficking in our supply chains.

### 5. Approval

This statement has been approved by the Trustees of the SCT Group.



## Revisions

Date of review or revision	Reason
<b>December 2017</b>	New Policy (legislation – Modern Slavery Act 2015)
<b>5 June 2019</b>	Adopted by Board of trustees
<b>First review March 2020</b>	Annual Review
<b>Next Review March 2021</b>	Annual Review
<b>Next Review March 2022</b>	