**StreetGames Modern Slavery Policy**

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| **Anti-slavery and human trafficking policy**  **1. Policy statement**  1.1 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 in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity. This policy sets out the steps that StreetGames has taken to ensure that slavery and human trafficking are not taking place in our delivery chain or in any part of our business.  1.2 StreetGames UK is a registered charitable company limited by guarantee whose core business is the delivery of sport, health, community and education activities in the areas of highest deprivation and poverty across the UK. StreetGames operates a staffing structure of approximately 70 employees, delivers through approximately 60 contractors and provides support to over 1000 community organisations across the UK.  1.3 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our delivery chain, consistent with our disclosure obligations under the Modern Slavery Act 2015 (updates July 2018). We expect the same high standards from all of our contractors. 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 will advocate that our the StreetGames network of local delivery organisations should hold their own high standards.  1.4 In implementing this approach StreetGames UK supports the Base Code of the Ethical Trading Initiative:     * Employment is freely chosen * Freedom of association and the right to collective bargaining are respected * Working conditions are safe and hygienic * Child labour shall not be used * Living wages are paid * Working hours are not excessive * No discrimination is practiced * Regular employment is provided * No harsh or inhumane treatment is allowed   1.5 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, volunteers, interns, contractors and external consultants  **2. Responsibility for the policy**  2.1 The Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.  2.2 The Chief Executive 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.  2.3 Line managers 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 the StreetGames delivery chain.  2.4 StreetGames field based staff across the UK, including contractors carrying out frontline support services to local organisations in the delivery chain are to be made aware of the policy and are given adequate and regular training on it and the issue of modern slavery in the StreetGames delivery chain.  2.5 All staff will be informed of the reporting process for any concerns relating to this policy.  **3. Compliance with the policy**  3.1 All StreetGames staff will be made aware of this policy and will be expected to read, understand and comply with its contents.  3.2 The prevention, detection and reporting of modern slavery in any part of our business or delivery chain is the responsibility of all those working for StreetGames or under contract. All staff contractors and volunteers are required to avoid any activity that might lead to, or suggest, a breach of this policy.  3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.  3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or delivery chain at the earliest possible stage.  3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.  3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within the delivery chain constitutes any of the various forms of modern slavery, raise it with your line manager or the Chief Executive.  3.7 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 as a result 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 our delivery chain. 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 the Chief Executive immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.  **4. Communication and awareness of this policy**  4.1 Training on this policy, and on the risk our business faces from modern slavery in the delivery chain, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.  4.2 Our zero-tolerance approach to modern slavery must be communicated to all local organisations we support, along with contractors and partners at the outset of our relationship with them and reinforced as appropriate thereafter.  **5. Breaches of this policy**  5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.  5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy. |