Modern Slavery Policy

1. **Introduction**

1.1. At Somerset Cricket Foundation, we are committed to acting ethically, and with integrity, in all our business dealings and relationships. We want to make sure that modern slavery and human trafficking is not taking place within our business or its supply chains.

1.2. The Modern Slavery Act 2015 places businesses of a certain size (those with a global turnover of over £36 million) under a legal obligation to publish a slavery and human trafficking statement each year. These businesses also have to report on steps taken during the year to make sure that modern slavery and human trafficking is not taking place in any part of their businesses or supply chains.

1.3. Based on our global annual turnover, we are not currently legally required to publish a slavery and human trafficking statement each year. However, we are committed to the abolition of modern slavery and human trafficking and voluntarily publish an annual statement detailing the steps we have taken on this issue**.**

1.4. This policy sets out our response to the Modern Slavery Act 2015 and:

a. Explains the concept of modern slavery and human trafficking.
b. sets out our commitment to being a business which is free from modern slavery and human trafficking and how we will achieve this.
c. Explains how you can help us conduct our business free from modern slavery and human trafficking.

2. **Scope**

2.1. This policy applies to all employees of Somerset Cricket Foundation, anyone else working for the Company, i.e., contractors, consultants, officers, interns, casual and agency workers, and our suppliers.

2.2. You are required to read and comply with this policy if you work for, or on behalf of Somerset Cricket Foundation in any capacity.

2.3. We recognise that everyone working for us has a role to play in preventing modern slavery and human trafficking.

Policy provided by www.commissioninghr.co.uk
Professional advice may be sought on the application of this policy.

3. Responsibilities

3.1. The role of the Managing Director is to ensure that agreed staffing policies and systems of infrastructure are in place and operating effectively to ensure that the legal requirements of the Company are met.

4. Definition of Modern Slavery

4.1. Modern slavery encompasses slavery, servitude and forced or compulsory labour. Human trafficking is defined as arranging or facilitating the travel of another person with a view to that person being exploited.

4.2. Slavery, forced labour, servitude and human trafficking are types of 'Modern slavery' which deprives victims of their liberty and usually involves financial and other exploitation.

4.3. We conduct our business fairly, ethically and with respect to fundamental human rights. We recognise that modern slavery exists in many forms, even in the UK. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chains. We will not tolerate it.

4.4. Our Anti-Slavery Officer ('ASO') is the Managing Director. They are responsible for this policy.

5. Preventing Modern Slavery in our business

5.1. It is a priority for us that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

5.2. We carry out appropriate checks on all employees, recruitment agencies and suppliers, so that we know who is working for us, or on our behalf and that they are not being coerced or controlled in any way.

5.3. We give every employee a written employment contract, and he or she is paid in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

Policy provided by www.commissioninghr.co.uk
Professional advice may be sought on the application of this policy.

6. **If you are one of our Suppliers**

6.1. We recognise that the biggest risk of modern slavery within our business comes from the actions of those in our supply chain. We look at each aspect of our supply chain and assess the risk in each area.

6.2. If you supply us with goods or services, you must assess your business and supply chains and confirm to us that you comply with your legal obligations, in relation to modern slavery, and are committed to ensuring there is no Modern Slavery taking place in your business, or in any of your supply chains.

6.3. If you breach this policy or are found to have Modern Slavery in your business, or knowingly in your supply chain, we may terminate our contract with you and pursue legal remedies against you.

7. **Responsibilities of our Employees, Workers and anyone providing services for us**

7.1. The prevention, detection and reporting of modern slavery in any part of our businesses or supply chains is the responsibility of all of us.

7.2. You should take the time to read and understand this Policy and appreciate the importance of working with us on modern slavery and human trafficking issues.

7.3. If your job involves procurement (i.e. you obtain goods or services for us as part of your job role), then you should make sure you follow all appropriate protocols before approving any supplier. You should consider the following questions as part of any due diligence process:

a Does the business trade with or operate in countries that are a known risk for modern slavery (for example India, China, Pakistan, North Korea, Afghanistan, Eritrea, or South Sudan)?

b Does the business operate in a sector which is high-risk for modern slavery (generally this will be the consumables industries, for example, cocoa, chocolate, tobacco, and cotton)?

Policy provided by www.commissioninghr.co.uk
Professional advice may be sought on the application of this policy.

c Is the supplier aware of modern slavery, and does it appear to have the desire to address this risk?

d Is the business happy to provide information regarding its own supply chain?

e Does the business monitor its own suppliers?

f Are the staffing costs in line with what we would expect for the size of the business?

g Does the business have a whistleblowing policy in place?

The answers you receive to these questions can tell you a lot about the modern slavery risk posed by the potential supplier. You should seek further support from your manager if the answers to (a) or (b) above are 'yes' or if the answers to any of (c)-(g) above are 'no'.

7.4. You must immediately report any suspicions of modern slavery in our business or supply chains to us. We will investigate within a reasonable time, on actions which may require to be taken.

8. Appropriate Reporting and Breaches of this Policy

8.1. We will take seriously all reports received raising concerns regarding modern slavery within our business and its supply chain, and we will investigate each one.

8.2. We will support all who raise genuine concerns in good faith under this Policy. We are committed to ensuring that you do not suffer any detrimental treatment in any form as a result of raising genuine concerns in good faith under this Policy. If you believe you have suffered unfavourable treatment, then you should inform your manager or consult our Grievance Policy and our Whistleblowing Policy.

8.3. If you are found to have acted in breach of this Policy or contrary to its aims and objectives, then we may take disciplinary action against you up to and including termination of your employment. If you are not an employee, then we may terminate any other form of engagement you may have with us.

Policy provided by www.commissioninghr.co.uk
Professional advice may be sought on the application of this policy.

9. **Review**

9.1. This policy does not form part of your contract of employment or agreement with us and will be subject to revision from time to time.

9.2. This policy reflects current statutory legislation at the time of writing. Any changes to statutory legislation will take precedence in the event of a dispute.

9.3. Should you have any feedback on this policy, please contact management.

9.4. History of Policy Changes

Date	Page	Details of the change	Agreed by
February 2021	All	New Policy	
October 2024	All	October 2024 Policy Refresh Updated throughout. New Introduction. Enhanced Responsibilities. Enhanced Reporting and Breaches	Jon Bendle

Policy provided by www.commissioninghr.co.uk
Professional advice may be sought on the application of this policy.