**Modern Slavery Policy**

**1.00 Introduction & Background**

Modern Slavery is a crime and a violation of fundamental human rights which can take many forms including the trafficking of people, forced labour, servitude and slavery.

The aims of the Modern Slavery Act 2015 are to ensure that law enforcement has stronger powers to ensure suitable punishment of perpetrators, provide greater protection and support for victims and encourage reporting of such crimes.

Stirling City Heritage Trust (SCHT) are committed to ensuring that we, and all those under our control, comply with our legal and ethical obligations in relation to the Modern Slavery Act 2015.

This Policy sets out SCHT’s commitment to a zero-tolerance approach to modern slavery and our pledge to act ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within our organisation or supply chains.

**2.00 Application of Policy**

This policy applies to all persons working for our organisation or on our behalf in any capacity, including (but not exclusively): employees, trustees, seconded workers, agency workers, volunteers, interns, contractors, external consultants, and seconded workers, wherever they may be located.

**3.00 Staff/Consultant Recruitment**

The Trust checks through our recruitment process that all job applicants and staff can demonstrate their eligibility to work in the UK. The Trust also requires all external consultants to confirm that they meet the requirements of the Act prior to commencing work with us.

**4.00 Staff Training**

Modern Slavery awareness training is provided to all staff and this also forms part of induction for new staff. Resources used are displayed on the Gov.uk website. These training resources used by SCHT explain to staff what modern slavery is, how it can be identified and how to report concerns about any suspected instances.

**5.00 Suppliers**

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

**6.00 Policy Compliance**

All of the above groups mentioned in 2.00 must ensure that they 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.

These individuals are required to avoid any activity which may lead to a breach of this Policy

All parties under our control are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage using the procedure outlined in 7.00 below.

**7.00 Reporting**

We are committed to keeping all our employees and anyone who comes into contact with the Trust safe from harm. Our procedures are in place, through staff training, to ensure that we recognise, report and respond to any concerns raised.

SCHT encourages the reporting of any concerns or breaches (even if they turn out to be mistaken) so that they can be dealt with appropriately in accordance with our policies and procedures.

Staff are encouraged in the first instance to report any concerns to the Trust Manager, Dr Lindsay Lennie.

Following this, confidential reporting can be made 24 hours a day to the Modern Slavery Helpline: 08000 121 700 or online at: [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org/)

Alternatively concerns can be raised with the Police on 101 or in an emergency situation by dialling 999.

SCHT aims to encourage openness and will support any employee who raises genuine concerns in good faith under this policy. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of our business or in our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If any member of staff believes that they have personally suffered any such treatment they should raise this with the Trust Manager immediately. If the issue is not remedied this can then be formally raised through the SCHT Grievance Procedure.

Our confidential employee counselling service also provides employees with a secure way of seeking advice about a range of topics, including modern slavery or human trafficking issues or concerns which may be affecting them or their families.

**8.00 SCHT Modern Slavery Act Statement**

This is endorsed by our Board of Trustees and reviewed annually.

SCHT’s Modern Slavery Act Statement can be viewed on our websites:

[www.Stirlingcityheritagetrust.org](http://www.Stirlingcityheritagetrust.org)

[www.Traditionalbuilidingshealthcheck.org](http://www.Traditionalbuilidingshealthcheck.org)

**9.00 Breaches of Policy**

Any employee who breaches this policy will face disciplinary action.

We may terminate our relationship with other individuals, partners and organisations working on our behalf if they breach this policy.

**10.00 Policy Review**

SCHT will continue to review and develop its systems and processes and manage its supply chains to assess and manage modern slavery risks.

This Policy will be reviewed annually.