



50. Anti-Slavery Policy

1.0 Policy Statement

- 1.1 Staffordshire Chambers of Commerce adopts a zero-tolerance approach to modern slavery, servitude, forced labour and human trafficking. We are committed to acting ethically, transparently and with integrity across all our activities and supply chains. We will not knowingly work with any organisation involved in modern slavery, and we expect all suppliers, contractors and partners to uphold these same standards.
- 1.2 The Chambers is accredited as a Real Living Wage Employer, demonstrating our commitment to fair pay and ethical labour practices.

2.0 Purpose

- 2.1 The purpose of this policy is to outline the measures we take to prevent modern slavery risks and set clear expectations for staff, managers, suppliers and partners. It supports our wider governance framework and aligns with our legal responsibilities.

3.0 Scope

- 3.1 This policy applies to all employees, agency workers, contractors, consultants, volunteers, secondees, suppliers and partner organisations engaged by Staffordshire Chambers of Commerce. It covers all business functions, procurement activity, service delivery, funded programmes and operational sites.

4.0 Our Organisation and Supply Chains

- 4.1 Staffordshire Chambers of Commerce is a long-established, member-led organisation delivering business support, enterprise programmes, international trade services, training, events and representation across Staffordshire.
- 4.2 Our supply chain is predominantly UK-based and includes professional services, facilities management, IT, training and event-related suppliers. While the overall risk of modern slavery is low, we recognise risk increases in outsourced services, multi-tier supply chains, certain international engagements and recruitment via third-party agencies.



5.0 Supporting Policies

5.1 Our approach is reinforced by several internal policies, including:

- Recruitment Policy with mandatory right-to-work checks
- Whistleblowing Policy enabling concerns to be reported safely
- Equality, Diversity and Inclusion Policy
- Dignity at Work and Anti-Harassment Policies
- Anti-Fraud and Anti-Money Laundering Policies
- Health and Safety Policies

5.2 These policies collectively protect workers, ensure fair treatment and support ethical business conduct.

6.0 Responsibilities

6.1 Senior Leadership and Governance

6.1.1 The Senior Leadership Team and the Audit and Governance Committee are responsible for oversight of this policy, monitoring compliance, reviewing risks and ensuring appropriate action is taken where concerns arise.

6.2 Managers

6.2.1 Managers must ensure staff are aware of this policy, embed it into local practices, conduct supplier due diligence and escalate concerns promptly.

6.3 All Staff

6.3.1 All employees must familiarise themselves with this policy, complete required training and report concerns using the Whistleblowing Policy.

7.0 Due Diligence Procedures

7.1 We take a proportionate and risk-based approach to due diligence. This includes checking public information for modern-slavery-related convictions, reviewing supplier policies, using contractual clauses requiring suppliers to comply with the Modern Slavery Act, maintaining a controlled supplier list and reserving the right to terminate relationships where non-compliance is identified. Internally, our recruitment processes include identity verification and right-to-work checks to prevent coerced, illegal or unethical labour.



8.0 Risk Management

8.1 We recognise increased risk of modern slavery in temporary staffing and outsourced services, international supply chains, multi-tier supplier structures and external recruitment channels. We manage these risks through supplier vetting, ongoing monitoring, clear contractual expectations and immediate action where concerns arise.

9.0 Training and Awareness

9.1 Employees involved in procurement, commissioning or supplier management receive training on identifying modern-slavery indicators and understanding escalation procedures. Training will be expanded to other staff groups where relevant.

10.0 Reporting Concerns

10.1 Any concerns about potential modern slavery must be raised via the Whistleblowing Policy. Reports are treated confidentially and without fear of reprisal.

11.0 Monitoring and Review

11.1 We monitor the effectiveness of this policy through reviewing concerns raised, verifying completion of right-to-work checks, reviewing supplier due-diligence outcomes and evaluating staff training and awareness.