

## **Slavery and Human Trafficking Statement**

### **POLICY STATEMENT**

#### **COMPANY STRUCTURE**

HCL is a limited company, wholly owned by Hertfordshire County Council (HCC). We deliver school meals in around 400 primary schools and 44 secondary schools within and around Hertfordshire, along with commercial catering at a few Business and Industry (B&I) contracts.

#### **OUR BUSINESS**

Our business operates in Mundells, Welwyn Garden City, AL7 1FT. As well as the operational team, there is a significant support and administrative function.

#### **OUR SUPPLY CHAINS**

Our supply chains include providers of food and equipment.

#### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and in so far as is possible to require our suppliers hold similar ethos.

#### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

We have in place a policy to protect whistle blowers who highlight to us any risk of slavery or human trafficking within our business.

#### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we aim to provide appropriate training for our staff.

### **MODERN DAY SLAVERY POLICY**

**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. HCL have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

**1.2** We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and 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 expect that our suppliers will hold their own suppliers to the same high standards.

**1.3** This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## **2. RESPONSIBILITY FOR THE POLICY**

**2.1** The Board of Directors 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 Quality and Assurance Officer 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** Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given appropriate training on it and the issue of modern slavery in supply chains.

## **3. COMPLIANCE WITH THE POLICY**

**3.1** 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. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

**3.2** All employees must notify your Manager or the Quality and Assurance Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

**3.3** All employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

**3.4** If you believe or suspect a breach of this policy has occurred or that it may occur, please notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

**3.5** If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the Quality and Assurance Officer.

**3.6** 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 any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, malicious claims, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager in the first instance.

#### **4. COMMUNICATION AND AWARENESS OF THIS POLICY**

**4.1** Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of employee induction process and employee training.

**4.2** 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.

#### **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.

HCL are committed to improving our practices to combat slavery and human trafficking.



**Signed off by: Lin O'Brien Chief Executive on behalf of HCL Board**

**Sign Off Date: 21<sup>st</sup> September 2017**

**Next Review Date: September 2018**