

# **SUNLIGHT DEVELOPMENT TRUST**

## **MODERN SLAVERY AND HUMAN TRAFFICKING**

### **STATEMENT**

#### **Introduction**

This statement is made on behalf of Sunlight Development Trust pursuant to the section 54(1) of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement. Sunlight is committed to ensuring that our business and supply chains are free of slavery.

Modern slavery encompasses

- Slavery;
- servitude;
- human trafficking;
- forced to work – through coercion, or mental or physical threat;
- owned or controlled by an 'employer', through mental or physical abuse or the threat of abuse;
- dehumanised, treated as a commodity or bought and sold as 'property';
- physically constrained or have restrictions placed on their freedom of movement.

Sunlight has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all our business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Sunlight acknowledges responsibility to comply with all principles of the Modern Slavery Act 2015 and will perform due diligence to provide transparency throughout the organisation.

The slavery act applies not only to Sunlight's own employees but also to suppliers, sub-contractors and other business partners. We have identified that there is potential for human trafficking or slavery to exist in our supply chain although we don't consider any activities to be of high risk. We are satisfied from our own due diligence there is no evidence of any act of modern-day slavery or human trafficking taking place within our organisation.

At Sunlight, we strongly oppose slavery and human trafficking and would never knowingly work with businesses, partners, contractors, supply chains or employees who don't follow the Act.

There is commitment throughout the organisation to legal compliance, ethical standards and fundamental human rights.

#### **Our Business**

The Sunlight Development Trust and Cafe Sunlight operate out of the Sunlight Centre at 105 Richmond Road, Gillingham, Kent ME7 1LX.

Our vision places the Sunlight Development Trust at the heart of Medway, providing a sustainable, secure, culturally diverse 'community anchor', involving and engaging community members and enhancing quality of life.

Our Mission is to reduce social isolation in the community by promoting, enabling, embracing and facilitating inclusive activities and making a positive difference to peoples' lives through the provision of education, training, employment, welfare, health, social, cultural and recreational activities.

## Our Policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include:

- **Anti-slavery policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- **Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- **Employee and Trustee codes of conduct.** We have employee and trustee codes of conduct in place to protect the organisation and inform employees and trustees of expectations. The codes of conduct include expectations and define acceptable behaviours. The purpose of codes is to develop and maintain a standard of conduct that is acceptable to the company, its users, customers and other employees.

## **Training**

To ensure a high level of understanding of the risks of modern slavery, human trafficking and exploitation in our supply chains and our business, we intend to provide training to our staff. We will also require our business partners to provide training to their staff.

Sunlight Board of Trustees and Senior Management will take responsibility of implementing this policy and its objectives and will provide the necessary resources to ensure that its practices are effective in ensuring that modern day slavery is not taking place.

A copy of this policy statement will be accessible to all employees electronically on the Sunlight website.

Signed

Chair of Board

December 2018