

**RHESTR WIRIO / FFURFLEN MANYLION – DOGFENNAU ERAILL
OTHER DOCUMENTS INFORMATION SHEET / CHECKLIST**

Document Title:	Slavery and Human Trafficking Statement – 2023-2024	
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Slavery and Human Trafficking Statement – 2023-2024

Grŵp Llandrillo Menai believes that when acquiring goods and services, it is crucial that it is done so without causing harm to others and is fully committed to acting ethically and with integrity in all its business dealings and relationships.

In so doing, Grŵp Llandrillo Menai supports the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights by informing its staff, students, governors, and stakeholders about Grŵp policy with respect to modern slavery, human trafficking, forced and bonded labour, and labour rights violations in its supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Grŵp's slavery and human trafficking statement for the financial year ending 2023.

Grŵp Llandrillo Menai is taking steps to ensure transparency in its supply chains and advocates avoidance of child labour, respecting human rights and avoiding exploitation in its commitment to sustainable and responsible procurement.

Grŵp Llandrillo Menai has identified the following categories as being of high risk: Clothing; Food; and ICT Equipment. Consequently, these are areas where it will concentrate its efforts.

Grŵp Llandrillo Menai believes that it has obtained assurances that its larger suppliers in these areas are acting appropriately and in accordance with internationally recognised code of labour practice, requiring that:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed.

Looking to the future, Grŵp Llandrillo Menai expresses its commitment to:

- Better understanding of its supply chains, working towards greater transparency and responsibility for the people working within them.
- Monitor areas that represent a risk, reviewing suppliers, framework organisations and franchisees, to closely monitor those supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains and take the appropriate action if necessary.
- Ensuring that all relevant staff will be offered appropriate training.
- Encourages all staff, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation through the Grŵp's Whistleblowing Policy. The whistleblowing procedure is designed to make it easy for staff to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can contact the Grŵp Director of Governance and Information.

The Grŵp's commitment to risk assessment and ethical procurement incorporating the principles of the 2010 Equality Act and the Modern Slavery Act 2015 in any procurement activity supports mitigation of the risks identified above.

To date the Grŵp hasn't been made aware of any human trafficking/slavery activities within the supply chain but if any were highlighted then it would act immediately in accordance with both legal and moral obligations.

This statement covers the Grŵp's work with all partners, including franchises.

All Grŵp Llandrillo Menai staff are mandated to undertake, and pass, a Modern Slavery iHASCO online learning module. This course raises awareness of the types of modern slavery, the key signs to look out for, and how to prevent, tackle and report it.

All Grŵp staff are encouraged to seek more information at UK Gangmasters and Labour Abuse Authority government website: www.gla.gov.uk

Context

The Welsh Government published the Code of Practice for Ethical Employment in Supply Chains in March 2017, with an expectation that all Welsh public sector bodies agree to sign up the Code.

In signing up, it is acknowledged that no organisation will be in a position to have fully satisfied all of the Code's commitments. Instead, signing up represents a pledge to commence the journey to meet the requirements of Code's commitments.

The table below sets out Grŵp Llandrillo Menai's position against the requirements of the Code's commitments.

Item No.	Description	Detail
1.0	Produce a written statement on ethical employment	This statement document is subject to annual review and revision.
1.1	Appoint an Anti-Slavery and Ethical Employment Champion	The Executive Direct of Corporate Services, Sharon Bowker
2.0	Produce a written policy on whistleblowing	A Whistleblowing policy is in place and subject to annual review.
2.1	Provide a mechanism for people outside the organisation to raise suspicions of unlawful and unethical employment practices.	The Grwp's Governance Officer oversees the Complaints Procedures. External, and internal, parties are encouraged to channel any suspicions or concerns through this mechanism.
3.0	Ensure that those involved in buying/ procurement and the recruitment and deployment of workers, receive training on modern slavery and ethical employment practices, and keep a record of those that have been trained.	Procurement and Finance Staff have access, and are completing, online e-Training course via HEPA covering many subjects including 'Equality and Human Rights' and 'Modern Slavery'. Procurement and Grŵp Staff are encouraged to visit the UK Government Gangmasters and Labour Abuse Authority web site for more information: http://www.gla.gov.uk/who-we-are/modern-slavery/ All staff training is recorded on internal intranet STEPS system.
4.0	Ensure that employment practices are considered as part of the procurement process. Including:	
4.1	Include a copy of the Grŵp Statement on ethical employment (Commitment 1) in all procurement documentation.	This Statement document will be included in all WTO GPA Above Threshold (OJEU) value tenders.
4.2	Include appropriate questions on ethical employment in tenders and assess the responses provided.	This is currently in place and where appropriate set as Pass/Fail.
4.3	Incorporate, where appropriate, elements of the Code as conditions of contract.	This is incorporated where appropriate.
4.4	Ask bidders to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.	This is already part of the Grŵp's tender process, although no experience of abnormally low bids to date.
5.0	Ensure that the way in which the Grŵp works with suppliers does not contribute to the use of illegal or unethical employment practices within the supply	

	chain. Grŵp Llandrillo Menai will:	
5.1	Ensure that undue cost and time pressures are not applied to any of its suppliers if this is likely to result in unethical treatment of workers.	Careful contract management will help ensure that undue pressure is not applied.
5.2	Ensure that its suppliers are paid on time – within 30 days of receipt of a valid invoice.	This is current practice
6.0	Expect Grŵp suppliers to sign up to this Code of Practice to help ensure that ethical employment practices are carried out throughout the supply chain.	All Grŵp procurement documents declare its commitment to the Code of Practice and strongly encourage suppliers to adopt a similar approach.
7.0	Assess Grŵp expenditure to identify and address issues of modern slavery, human rights abuses, and unethical employment practice. Grŵp Llandrillo Menai will:	
7.1	Carry out regular reviews of expenditure and undertake a risk assessment on the findings, to identify products and/or services where there is a risk of modern slavery and/or illegal or unethical employment practices within the UK and overseas.	Awaiting more details and guidance from the Welsh Government and they will advise when available. All GLLM suppliers are Approved prior to order placement.
7.2	Investigate any supplier identified as high risk, by direct engagement with workers wherever possible.	Awaiting more details and guidance from the Welsh Government and they will advise when available. Amazon and Ebay purchases are discouraged.
7.3	Work with its suppliers to rectify any issues of illegal or unethical employment practice.	Grŵp Llandrillo Menai will seek legal advice to address any issues if and when they arise. This will also be achieved through contract management
7.4	Monitor the employment practices of its high-risk suppliers, making this a standard agenda item for all contract management meetings/reviews.	Awaiting more details and guidance from the Welsh Government and they will advise when available.
8.0	Ensure that false self-employment is not undertaken, and that umbrella schemes and zero hours contracts are not used unfairly or as a means to:	
8.1	Avoid, or facilitate avoidance of, the payment of tax and National Insurance contributions and the relevant minimum wages.	IR35 checks are carried out on potential sole traders to determine tax status.
8.2	Unduly disadvantage workers in terms of pay and employment rights, job security and career opportunities.	Welsh Government are in the process of developing a workflow to ensure this happens and advise when available. No Grŵp Llandrillo Menai staff currently on zero hours contracts.
8.3	Avoid Health and Safety responsibilities.	The Welsh Government is in the process of developing a workflow to ensure this happens and they will advise when available.
9.0	Ensure that workers are free to join a Trade Union or collective agreement and to undertake any related activity and raise worker concerns without risk of discrimination. We will:	This process is already in operation
9.1	Not make use of blacklists/prohibited lists.	
9.2	Ensure that Grŵp suppliers do not make use of blacklists/prohibited lists.	This process is already in operation
9.3	Not contract with any supplier that has made use of a blacklist/prohibited list and failed to take steps to put matters right.	This process is already in operation
9.4	Expect Grŵp suppliers to allow employees access to Trade Unions and representatives.	This process is already in operation
10	Consider paying all staff the Living Wage Foundation's Living Wage as a minimum and encourage our suppliers to do the same. Grŵp Llandrillo Menai will:	

10.1	Consider paying at least the Living Wage Foundation's Living Wage to all its staff in the UK.	As of April 2018, all Grŵp Llandrillo Menai staff are paid at least the Real Living Wage
10.2	Consider becoming an accredited Living Wage Employer.	No further action at this time
10.3	Encourage its suppliers based overseas to pay a fair wage to all staff, and to ensure that staff working in the UK are paid at least the minimum wage.	Awaiting more details and guidance from the Welsh Government and they will advise when available.
11.0	Produce an annual written statement outlining the steps taken during the financial year, and plans for future actions, to ensure that slavery and human trafficking are not taking place in any part of our organisation and its supply chains. Grŵp Llandrillo Menai will:	
11.1	Ensure that the statement is signed off at senior management/board level.	This action is now standard operation procedure.
11.2	Publish the statement on Grŵp Llandrillo Menai website. If this is not possible, the Grŵp will provide a copy to anyone within 30 days of a request being made.	Current Statement readily available from Grŵp Llandrillo Menai l website.