



Anti-Slavery and Human Trafficking Policy

Feel Good Factor (Leeds) is a provider of health and wellbeing services and activities in the voluntary sector and has our registered office in Leeds, England.

Introduction and Statement of Intent

Modern Slavery is a crime and a violates fundamental human rights in various forms, such as slavery, servitude, forced or compulsory labour or human trafficking. All these have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

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

We are committed to ensuring there is transparency in our business and our approach to tackling modern slavery throughout our supply chains, in accordance with our obligation of disclosure in the Modern Slavery Act 2015. We expect the same high standards from all of our suppliers, contractors and other business partners.

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

This policy is non contractual and we may amend it at any time. However, all employees are expected to uphold the principles of the policy.

The Board of Directors endorses this policy statement and is fully committed to its implementation. It will be regularly reviewed and updated as necessary.

Responsibility for the Policy

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.

The Chief Executive 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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

All Employees and Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Chief Executive.

Compliance with the Policy

You must ensure that you read, understand and comply with this policy. All those working for us or under our control are responsible for, detection and reporting of, modern slavery in any part of our business or supply chains. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You **must** notify your Line Manager or the Chief Executive as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You 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.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager or Chief Executive or report it in accordance with our Whistleblowing Policy as soon as possible.

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 Chief Executive.

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. If you believe that you have suffered any such treatment, you should inform your Line Manager immediately. Alternatively, you may refer to the grievance procedure.

Communication and awareness of this policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the beginning of any business relationship with them and restated as appropriate thereafter.

Recruitment

All of our employees are UK based and we are compliant with the National Living Wage requirements. We ensure compliance with all aspects of UK employment law. Further :

- All staff will have a written contract of employment and will not be asked to pay any direct or indirect fees to obtain work
- The Services Support Manager will ensure staff are legally able to work in the UK and conduct background checks
- Information will be provided to all new recruits on their statutory rights including sick pay, holiday pay, and any other benefits they be entitled to
- Any staff involved with the recruitment of employees will follow the organisation's reporting procedures should they suspect someone is being exploited

Identifying Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. The following list of indicators, which is not exhaustive, could trigger suspicions that someone may be a slavery or trafficking victim. The person:

- may not be in possession of their own passport, identification or travel documents
- will allow others to speak for them when spoken to directly
- will be withdrawn or appear frightened

- does not seem to be able to contact friends or family freely
- may be cohabiting with a high number of other individuals sharing occupancy (often a factor for those being exploited)
- has limited social interaction or contact with people outside their immediate environment

A person may display a number of the indicators as set out above but they may not necessarily be a victim of slavery or trafficking

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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