

MODERN SLAVERY STATEMENT

A) ORGANISATION

This statement applies to Rochdale Connections Trust (RCT) (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2023/2024.

B) DEFINITIONS

RCT considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

C) COMMITMENT

RCT acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. RCT understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

RCT does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to RCT in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. RCT strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in England.

D) POTENTIAL EXPOSURE

In general, RCT considers its exposure to slavery/human trafficking to be relatively limited, nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

E) IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for RCT, as it did for others across the nation.

RCT welcomes the UK Government’s decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

RCT concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under ‘POTENTIAL EXPOSURE’ above.

During the pandemic, the Group’s employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

RCT's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

F) STEPS

RCT carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

RCT has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, RCT has taken the following steps to ensure that modern slavery is not taking place:

- reviewing our contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- measures in place to identify and assess the potential risks in our supply chains;
- undertaking impact assessments of our services upon potential instances of slavery;
- creating action plans to address risk to modern slavery;
- actions taken to embed a zero tolerance policy towards modern slavery;

G) SLAVERY COMPLIANCE OFFICER

RCT has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to RCT obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 28th July 2022

Signed: *Kathy Thomas*

CEO

Date: 9th August 2023