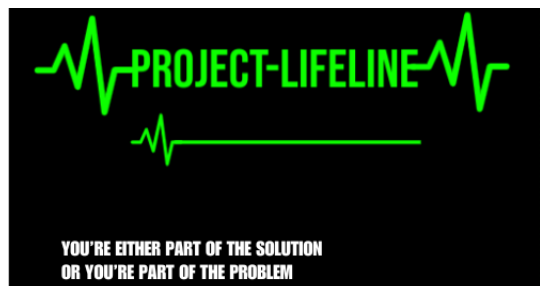


Project Lifeline

WE ARE PART OF THE SOLUTION



Modern Slavery & Human Trafficking Statement

Introduction

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.

Project Lifeline has 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. We expect the same high standards from all of our business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

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

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the policy

Project Lifeline has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Cheronagh Lillie 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.

You 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 Cheronagh Lillie, Director.

Compliance with the policy

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us or under our control. 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 a company Director 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 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 company Director as soon as possible.. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, raise it with your line manager or company Director. 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, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately.

Communication & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

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.

Organisation structure and supply chains

Project Lifeline runs company operations in the United Kingdom. We operate as a community interest company in the crime prevention sector. We work with our business partners to provide services for young gang affiliate youth including training and employment schemes, mental health support, mentoring services, advocacy support and solicitor services. For more information about us please visit our website projectlifeline.org.uk.

Policies in relation to slavery and human trafficking

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include the following:

- Safeguarding Policy
The purpose of our safeguarding policy is to protect children and vulnerable adults and provide stakeholders and the public with the overarching principles that guide our approach to doing so.
- Equal Opportunities Policy
The purpose of the equal opportunities policy is to prevent discrimination in the workplace and provide equal opportunities for all.

We make sure our business partners are aware of our policies and adhere to the same standards.

Due diligence processes

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains we have adopted the following due diligence procedures:

- Conducting supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Creating an annual risk profile for each supplier.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks.
- Reduce the risk of slavery and human trafficking occurring in our business.

Risk assessment and management

We have evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring through:

- Evaluating the slavery and human trafficking risks of each new business partner.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because we are based in the UK with strict regulations and we are a community interest company.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers/business partners, we will seek to terminate our relationship with them with immediate effect.

Key performance indicators to measure effectiveness of steps being taken

The KPIs we use to measure effectiveness and ensure that slavery and human trafficking is not taking place in our business and supply chains are as follows:

- We require all staff to complete training on modern slavery on induction.
- Developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain.

Training on modern slavery and trafficking

All staff are required to attend training on modern slavery and trafficking to aid prevention, detection and reporting. This forms part of our induction process for all staff and volunteers and is mandatory. Our modern slavery training covers:

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

As well as training staff, the organisation has raised awareness of modern slavery issues by circulating emails to staff. The emails explain to staff:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

Approval and Review

Approval By M Rodney

Date 01/11/2023

Next Review Date 01/11/2024