

## **Modern Slavery statement**

CXK is a value driven charity, fully committed to preventing modern slavery and human trafficking within the Charity, and engagement, awareness and commitment with our stakeholders and our supply chains. In 2022/23 CXK, supported by an external consultant, has been strengthening our Corporate Social Responsibility (ESG) agenda, including reviewing the Charity's management of our supply chain and our human rights and modern slavery policies.

### **CXK Organisational Structure**

CXK is a Charity. The Charity is subject to all applicable UK legislation and is required to comply with all relevant Government policies and charity guidance. CXK is registered with the CXK Charity Commission.

The Charity provides a range of services, predominantly contracting with the Government and Local Authorities including DfE, DWP and MOJ. As contracting authorities, they are subject to UK public procurement rules and UK Government - Implementing legislation, namely the 2015 Public Contracts Regulations (as amended) and associated government policies and guidance e.g. Procurement Policy Notes.

We recognise our responsibility to ensure that there is no slavery or human trafficking in our own activities or across our supply chains.

### **Our commitment to the principles of the Modern Slavery Act 2015**

CXK is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities' employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves. We have robust safeguarding and EDI policies in place which provide a strong platform for all our delivery activities.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

### **Supply Chains and Due Diligence Processes and Practices**

CXK procures goods and services from a restricted range of suppliers. The geographical profile of these suppliers is predominantly UK based; however, some companies (ICT based) have global supply chains that are subcontracted to support their business.

Due to the nature of our charity's business and the safeguarding measures we have in place, we assess ourselves to have a low risk of modern slavery in our business and supply chains. We know that our supply chain presents the greatest risk of Slavery and Human Trafficking, so our relationship with suppliers is a critical part of our commitment to eliminating modern slavery.

CXK holds Merlin Accreditation which requires the design of our supply chain to include mutual agreement on a set of core principles, performance indicators and behaviours. This includes ensuring that CXK:

- Complies with the requirements of the Modern Slavery Act 2015.
- Carries out due diligence to ensure Supply Chain Partners have strategies, policies, and processes in place to maintain effective compliance with the Act and monitors this through the inclusion of KPIs specific to Modern Slavery in reporting measures.
- Actively promotes and facilitates the development of staff within the supply chain.
- Supports our supply chain to comply and keep themselves updated with legislative and regulatory requirements.
- Actively seeks feedback from all stakeholder groups, including through external auditing and assessment activities, and uses it to inform and improve practices throughout the life of the contractual relationship.

### **Internal Operations**

CXK has a responsibility to ensure that our employees are not being exploited, that they are safe at work and that relevant employment, health and safety and human rights laws are followed. To ensure that there is no Modern Slavery or Human Trafficking within CXK, we prioritise the following interventions:

- All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave their employment. Employees are free to serve notice at any time.
- CXK carries out verification of an employee's identity and right to work in the UK.
- We do not retain any employee's physical identity documents (e.g. passport) during their employment.
- CXK complies with, or provides enhanced versions of, all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies and sickness, parental leave and minimum rest break periods.
- The rights of all employees to join a trade union are respected and we are committed to engaging with trade unions where applicable.
- All employees have access to several different routes to raise and report concerns, ranging from line management to submission of an anonymous Whistleblowing Referral Form.

### **CXK Policies**

CXK maintains several policies applicable to all our employees to support the steps taken to prevent modern slavery in our operations and supply chain. We continuously review and improve our policies with input from employee groups, specialists and third-party specialists where appropriate. Our policies include:

- **Corporate Social Responsibility** - sets out the standards of behaviour and conduct expected of CXK employees, ensuring that legal and ethical principles are followed in all areas of the business and upholding a zero tolerance on illegal or unethical behaviour.
- **Whistleblowing** – encourages colleagues to speak up if they have concerns about illegal practices within CXK or our supply chain.
- **Equality & Diversity** - CXK is committed to establishing and maintaining a working environment which is free from discrimination and values all employees as individuals.
- **Safeguarding and Prevent** – Identifies key legal and operational responsibilities and processes required to support management and staff compliance.

### **Training**

Modern slavery exists in many forms in the UK, including trafficking into criminal activities like cannabis farming, sexual exploitation, domestic servitude, forced or bonded labour. CXK delivers a range of advice and support services, many to vulnerable people in areas of social and economic disadvantage. We recognise the importance of enabling and supporting our staff to recognise the indicators of Modern Slavery and take appropriate action.

CXK provides a wide range of classroom based and online training. A number of these are mandatory at induction and are annually refreshed including Modern Slavery, Safeguarding, the Prevent duty, Equality and Diversity & Inclusion.