![PositiveCulture logo](www.positiveculture.org)

Statement Regarding Modern Slavery

Positive Culture Ltd is not a relevant organisation under Section 54 of the Modern Slavery Act 2015 as we do not have a turnover of over £36million. However, we voluntarily operate a programme to ensure that slavery/human trafficking do not exist in our operations or supply chain.

Policy framework, culture, and training

We respect human rights, do not discriminate, and comply with all relevant laws and regulations. Our policies help ensure best practice: we operate to a system of ethical values, supported by our Human Rights Policy; our Recruitment Policy sets out the requirement to be aware of modern slavery in recruiting staff; and our Whistleblowing and Safeguarding Policies identify responsibilities under the Modern Slavery Act.

We respect human rights and therefore provide a workplace free from harassment and intimidation. Our members are not forced to work against their will, and they work without threat of punishment. All staff attend training which covers human rights, safeguarding and whistleblowing, all of which refer to modern slavery, with details of how to identify potential signs of modern slavery and how to report concerns internally or externally. Training and polices support a culture where we respect human rights and therefore provide a workplace free from harassment and intimidation. Our staff are not forced to work against their will, and they work without threat of punishment.

Leadership and risk management

Directors and senior management recognise the need to address modern slavery. Director Elizabeth Secrette has named responsibility for ensuring we operate according to the Modern Slavery Act even though we are not a Relevant Organisation.

The directors have conducted an analysis of our operations to determine where the greatest likelihood of slavery exists. A supply chain mapping process is in place to follow this risk analysis through subcontractors and suppliers.

Staffing/HR

Our ethical risk log identifies that the greatest modern slavery risk within our operation is the employment of staff members who are controlled by another party. We therefore have various procedures in place to identify such circumstances:

- Head office staff managing the payroll process are trained in the requirements of minimum wage legislation, ensuring full legal and contract compliance in terms of remuneration when considering all employee time (including all non-contact time).

- All managers are trained in how to recognise modern slavery and what to do if they suspect its presence.
- Procedures requiring face-to-face supervision is to take place at least once every three months for each employee with their line manager make sure that no staff member is "hidden" from supervision, providing everyone with the opportunity to raise any issues and managers with the chance to observe staff appearance and behaviour.
- Recruitment processes include right to work and identity checks.
- Payroll processes check for multiple payments to the same bank account and staff members resident at the same address.

Records of all the above procedures are maintained and reviewed as part of internal audit processes, thus ensuring that we operate a system which will successfully ensure that slavery does not exist within our operations and that we do not support human trafficking within the business.

Supply Chain
We believe in developing mutually beneficial long-term relationships based on mutual trust with all subcontractors and suppliers. To foster that trust, we pursue close and wide-ranging communication to share our knowledge to enhance our business relationship. Subcontractors are expected to follow the same operational safeguards we have (as described above) and we review the policies of suppliers against our Supplier Code of Conduct which sets out Slavery and Labour standards to be upheld by direct suppliers and in the supply chain.

Signed:

Elizabeth Secrette
Director
31st January 2025