

**Greater Manchester Chamber of Commerce**  
**Modern Slavery & Human Trafficking Statement**  
**September 2019**

This is the Chamber's first modern slavery and human trafficking statement. It sets out the steps we have taken and will take during 2019/20 to prevent modern slavery and human trafficking within our organisation and supply chains.

# Chief Executive's Statement



This year, we are delighted to celebrate our 225<sup>th</sup> anniversary. Chambers of Commerce were set up to further the interests of local businesses and campaign on their behalf. As the UK's largest Chamber, we represent around 5000 members, I see the work we are doing to help tackle modern slavery and human trafficking as central to our responsible approach of doing business.

Working in partnership with other anchor organisations, we are working together to make sure Greater Manchester is a region, which provides safe and decent working conditions, fair reward and protection from forced labour, modern slavery and harsh or inhumane treatment.

Demonstrating our commitment to end modern slavery and human trafficking, GMCC is making our own pledge:

**GMCC will work with members, partners and anchor organisations across GM to safeguard our businesses, residents and those at risk or in situations of modern slavery and human trafficking, to make sure modern slavery and human trafficking has no place in our communities.**

We support and promote the following principles:

- **Ensuring our pledge is considered as part of the Chamber's business strategy and in formal decision-making processes**
- **Making sure that our safeguarding, recruitment and whistleblowing policies are all fully compliant with The Modern Slavery Act 2015**
- **Due diligence is followed to eradicate modern slavery and human trafficking from our supply chains and that it is not a part of the Chamber's workforce**
- **Raise awareness of the crime among staff, members and our communities, to be able to identify and refer victims of modern slavery and human trafficking**
- **Making sure that those who provide the products and services we buy and sell are treated fairly, and that their fundamental human rights are respected.**

Our pledge and principles are a starting point that we will continue to develop and adapt. We expect our Members, partners and other anchor organisations to hold us accountable to these commitments. In turn, we expect others to be accountable for theirs and to demand the same standards from their customers and partners.

A handwritten signature in blue ink, appearing to read 'Clive', followed by a stylized flourish.

*Clive Memmott* - Chief Executive

This statement was approved by the Board of Greater Manchester Chamber of Commerce

September 2019

# **Greater Manchester Chamber of Commerce Modern Slavery & Human Trafficking Statement**

September 2019

**This is our first modern slavery and human trafficking statement. It sets out the steps we've taken over the last year to prevent modern slavery and human trafficking taking place in our business and supply chains.**

## **About us:**

Greater Manchester Chamber of Commerce is a business with clear commitment to social value. Since we were founded in 1794, our commitment has helped shaped the services we provide to our Members. That's why we're doing everything we can to make sure slavery has no part in the services we sell and the services we use. And that's why we're actively campaigning for better support for victims of modern slavery. This is our first modern slavery and human trafficking statement. It sets out the steps we are taking to prevent modern slavery and human trafficking taking place in our business and supply chains.

## **External Awareness - from Autumn 2019 onwards, we will:**

- Issue our first ever Modern Slavery & Human Trafficking Statement
- Run a high-profile social media campaign on Anti-Slavery Day, 18<sup>th</sup> October 2019, which will reach all of our 5,000 Members and their employees (c.300,000).
- Actively participate in the 'Greater Manchester Modern Slavery Business Network' (led by the Co-op). We will contribute to the work of this group by sharing best practice in addressing modern slavery and human trafficking, working together to identify challenges and opportunities for collaboration.
- Include information sessions on how to identify and refer victims of modern slavery and human trafficking at our 'Action 4 Business' events.
- Deliver regular communications to over 30,000 social media followers, to raise awareness of modern slavery and what action to take if they suspect it.
- Work with other anchor organisations in Greater Manchester to promote the UK 24-hour Modern Slavery Helpline and guidance on how to 'Spot it and Stop it' to mark Anti-Slavery Day

## **Raising awareness of Modern Slavery & Human Trafficking:**

Although the issue of modern slavery has been getting more attention in government, business and the media, we know that the general public has little awareness of it. According to research undertaken by the Cooperative Group in 2017, 18% of people didn't know what Modern Slavery is. Until this changes, modern slavery will remain 'hidden in plain sight' – which is why our campaign also includes awareness-raising activities.

We're focusing first on our staff and members, as that's where we can have most impact. But we're also exploring opportunities to engage all businesses and communities in Greater Manchester.

## **Internal Awareness – From October 2019 onwards, we will:**

**1. Train our staff and Board members** to help raise awareness, better spot the signs and increase confidence in reporting modern slavery when potential cases are encountered. We believe that an increased awareness and reporting helps law enforcement to tackle the perpetrators of modern slavery as well as protecting victims.

We will provide staff and Board members with access to up to date training resources provided by the UK Home Office, as follows:

[Modern slavery training: resource page - GOV.UK](#)

**2. Ensure our policies are up to date** and clearly set out what action needs to be taken to prevent, report and deal with modern slavery and human trafficking, should it arise.

### **Whistleblowing policy**

GMCC has a whistleblowing policy intended to encourage and enable staff to report suspected wrongdoing and raise serious concerns within the workplace. GMCC employees and Board members are given internal contact points to report on legal and regulatory violations, including suspicions of human rights violations, in connection with GMCC business. We are committed to ensuring that any staff concerns are taken seriously and properly investigated.

### **Recruitment policy**

GMCC treats our employees with respect and dignity and operates internal policies to ensure that we are conducting our business in an ethical and transparent manner. Our policies and procedures are reviewed and updated on an annual basis and are available to staff and Board members via a shared drive. We ensure our recruitment policies include employee screening checks, which are carried out to make sure the individual is legally entitled to work in the UK to safeguard against human trafficking or individuals being forced to work against their will, and we expect the same of each of our suppliers. Our staff are free to leave their employment after reasonable notice and are not required to lodge deposits of money or identity papers with GMCC. The compensation and benefits paid to employees for a normal working week comply at least with the real living wage requirements recommendations, and working hours comply at least with the national legal standards and are not excessive.

### **Supplier policy**

GMCC procures all goods and services based on objective and fair criteria that reflects the principles of non-discrimination, equal treatment, transparency, procedural fairness, mutual recognition and proportionality. Critically, wherever possible, all goods and services will be purchased from local suppliers to ensure we retain a focus on social value and support our local businesses. In addition to carrying out due diligence on prospective suppliers, they are expected to confirm they are aware of GMCC's Modern Slavery and Human Trafficking Statement, they agree to GMCC's contractual terms and conditions, they will comply with GMCC's policies and procedures and provide the services in accordance with all applicable laws and regulations. We expect our suppliers to exercise due diligence along their supply chains. GMCC has obligations in its agreements with suppliers requiring them to comply with all laws including those relating to slavery and human trafficking to ensure that there is no trafficked, bonded, child or forced labour within their supply chain. GMCC may terminate the relevant contract immediately if the supplier does not comply with these requirements.

**Monitoring & audit policy**

GMCC regularly monitors key suppliers at Audit & Risk Committee meetings and any necessary actions and issues, including non-compliance or laws or regulations, are tracked by the relevant operational area and reviewed at the next Audit & Risk Committee meeting. We will work to remedy any areas in which suppliers do not meet our standards or do not comply with relevant laws or regulations. In addition, GMCC has an autonomous and independent external audit function which has an unrestricted right to obtain information and to conduct audits within GMCC to determine whether statutory obligations are being fulfilled and reports its findings to the senior managers and directors of GMCC. If there is any specific suspicion of violations of laws, employees are expected to inform the Finance Director in the first instance.