



Modern Slavery and Human Trafficking Statement

August 2021



Our statement on Modern Slavery and Human Trafficking:

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps Community Brands UK (and all its subsidiary companies) has taken and is committing to take to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Community Brands UK deliver solutions for school payments, communications, data and analytics. At the time that this policy was released, we employed 150 people in the UK and our group turnover was £21.4 million. As part of the education sector, we acknowledge that we have a responsibility to take a robust approach to slavery and human trafficking and we are committed to acting ethically and with integrity when engaging with our own team, as well as acquiring goods and services.

What is “Modern Slavery and Human Trafficking”?

The most prevalent form of corporate modern slavery is forced labour, with 130,000 people thought to be trapped in the practice in the UK alone. Forced labour occurs when victims are put to work against their will without any other option. Organised criminals target the vulnerable, enticing them with offers of food, safety, accommodation and paid work. This never materialises; on arrival, identity documents are confiscated and, instead of the life their captors promised, victims are forced to live in over-occupied, cramped conditions, with no hygiene facilities and only soiled mattresses for comfort while controllers take their pay.

Although we believe that our business is at low risk of engaging with such individuals, it's still possible that traffickers could infiltrate our wider supply chain; more than three-quarters of companies suspect modern slavery within their operations or supply chain, which is a statistic* too prolific to ignore.

Our Own People

Our people are our greatest asset, and we pride ourselves on ensuring that all of our team are paid at least the national living wage. We undertake rigorous checks with anyone who wants to join our team: we ensure that all relevant pre-employment checks (such as documents which show an employee's right to work in the UK) are double checked internally, verified in accordance with company policy and legislation as well as cross checked for anomalies. We understand that typical warning signs that someone may be the victim of forced labour include numerous employees registered to the same address, or the inability to produce original identity documents on demand, and so our HR and Payroll team are trained to spot these anomalies.

Where we have concerns that an applicant may be the victim of forced labour or human trafficking, we encourage our team to report these concerns immediately to a Director of the business, who will then take the appropriate action.

Our Supply Chain




We work in partnership with a broad range of national and international suppliers and agencies and therefore see this as another important focus for managing and monitoring any potential contravention of the Modern Slavery legislation.

We partner with a range of suppliers for a wide variety of supplies and services which can make it challenging to effectively review and challenge all suppliers. At present we do not conduct audits of our suppliers and their business activities nor do we investigate working conditions in supply chains in any other way.

We have identified areas where modern slavery offences are more likely to occur in our supply chain, for example; cleaning and catering. For procurement activities within these high risk areas, mandatory compliance checks are undertaken at an early stage in the process.

We remain committed to continue to better understanding our supply chains and will work towards achieving greater transparency in the processes that go into providing our services. We will demonstrate year on year improvements in this project.

This policy will be reviewed annually.

Signed	Name and position	Date
	Richard Grazier, Managing Director.	25 th August 2021.

*<https://www.peoplemanagement.co.uk/voices/comment/hr-has-a-big-role-to-play-in-stamping-out-modern-slavery#gref>



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