



## **CUMBRIA CHAMBER OF COMMERCE MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FINANCIAL YEAR 2022-23**

### **INTRODUCTION**

This modern slavery and human trafficking statement is made on behalf of Cumbria Chamber of Commerce & Industry pursuant to section 54(1) Modern Slavery Act 2015. While we are a small business and are not required to produce a statement under the legislation, we have chosen to do so.

### **OUR BUSINESS**

Cumbria Chamber of Commerce is a company limited by guarantee, owned by its member businesses. As a social enterprise, any profits generated are reinvested to enhance our service delivery, and in doing so support the business community.

We operate four pillars of activity: membership and member services, networking and events, policy and representation, business support and training.

We do this under the Cumbria Chamber of Commerce, Cumbria Business Growth Hub and Made in Cumbria brands. We also have a wholly owned subsidiary Made in Cumbria Ltd.

Almost all goods and services we purchase come from within the UK, and primarily from within Cumbria. The key exceptions are in relation to ICT solutions.

### **OUR SUPPLY CHAINS**

Our supply chain involves a range of goods and services, including primarily: business support partners; advisers, trainers and consultants; ICT, office and business supplies and services; venues and catering; premises and related services; and design and promotion.

The majority of our advisers, trainers and consultants are self employed or one person/partnership limited companies. Some are SME and occasionally larger businesses. Our advisers, trainers and consultants are based in the UK. Our supply chain partners make some limited use of sub-contract business advisers and trainers.

We have due diligence and contract management procedures in place, which we continue to review and improve. We undertake checks to ensure compliance and quality oversight as well as ensuring we operate robust governance and safeguarding arrangements.

In 2023 we intend to introduce a Modern Slavery Procedure for Suppliers will set out how we will ensure that all our suppliers are complying with the law on modern slavery and inform suppliers of our operating and reporting procedures regarding this crime.

Our procurement process has been amended in this year's annual review to set out our commitment to ethical and responsible labour practices that we expect of our suppliers. These standards will be included in our tender specifications moving forward for new procurements. Also from April 2023 our contracts

will be amended to include modern slavery clauses and underpin our zero tolerance stance on the exploitation of labour.

### **OUR BUSINESS CUSTOMERS**

As a Chamber of Commerce and Growth Hub we will raise awareness and understanding of the issues and use our influence to encourage and support the businesses we work with to tackle modern slavery and improve labour practices.

### **OUR POLICIES AND CONTROLS**

We have a number of policies in place which help to minimise the risk of modern slavery including:

- Procurement policy
- Anti-Slavery and Human Trafficking Policy
- Anti Bribery and Corruption Policy
- Safeguarding Policy
- Whistleblowing Policy
- Vulnerable Adults Policy
- Recruitment Policy
- Training & Development Policy

As highlighted above in 2023 we intend to add a Modern Slavery Procedure for Suppliers.

Having added Modern Slavery to our training policy in the 2023 review, moving forward we will implement staff and adviser training on safeguarding and modern slavery.

We encourage openness and are committed to investigating any concerns raised by colleagues and stakeholders and taking appropriate action.

Our recruitment process and equality and diversity policy include robust procedures to ensure that our recruitment processes are fair, transparent and fully compliant with UK law. This includes checking right to work documents for all staff, agency workers and contractors.

### **REPORTING**

In 2023/24 we intend to introduce a modern slavery reporting procedure, providing a clear mechanism for the reporting and governance of suspected or identified instances of modern slavery by colleagues, including signposting the Modern Slavery helpline.

Any instances identified are reviewed by the Senior Management Team and notified to the Board.

In the year ending March 2022/23 we have had no reports of modern slavery or suspected incidents within our business or supply chain.

### **DUE DILIGENCE PROCESSES**

Moving forward in 2023/24 we will be incorporating appropriate consideration of modern slavery in our due diligence and tendering processes and our supplier management arrangements. All in-scope suppliers will be required to provide a link to their annual statements. Ongoing supply chain partner management will include annual due diligence checks.

Suppliers will be required to sign up to a code of conduct covering:

- commitment to paying at least the local minimum wage
- commitment to reasonable working hours and conditions
- conducting appropriate risk assessments
- having procedures in place for dealing with any concerns or incidents of modern slavery or human trafficking (including protecting whistleblowers)

Responsibility sits with the Managing Director, working with the Senior Management Team.

### **RISK MANAGEMENT AND ASSESSMENT OF EFFECTIVENESS**

Country risks: Our exposure to the risk of modern slavery in high risk countries (where protection against breaches of human rights is limited) is low. Our supply chains are almost entirely in the UK and not generally characterised by second tier subcontracting.

Sector risks: We recognise that we work with some businesses and within some sectors considered higher risk, including hospitality, construction and manufacturing. We aim to increase our colleagues' and our business contacts' awareness and knowledge about modern slavery, the signs to look for and what steps to take if an instance is suspected.

Vulnerable groups: Through some of our programmes we support some vulnerable groups who could be at higher risk of modern slavery, including women, migrants and refugees. We will work with participants to ensure potential issues are identified alongside our safeguarding arrangements.

### **AWARENESS, TRAINING AND COMMUNICATION**

While we have not done anything specific during 2022/23, moving forward we will provide training for staff and advisers and raise awareness and understanding in the business community more widely through, for example, our e-communications, websites and events.

### **PERFORMANCE INDICATORS (KPIs)**

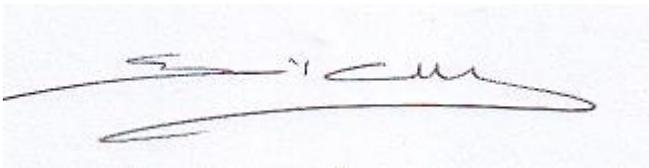
We did not have formal KPIs in place for 2022/23.

For 2023/24 our KPIs are:

- Provide training session for staff and advisers
- At least one e-newsletter article, podcast or equivalent and include this on our websites as relevant
- Implement Modern Slavery Procedure for Suppliers
- Enhance due diligence and contracting to cover modern slavery

### **APPROVAL**

This modern slavery and human trafficking statement was approved by the Managing Director of Cumbria Chamber of Commerce & Industry Ltd on 27<sup>st</sup> March 2023.

A handwritten signature in black ink, appearing to read 'Suzanne Caldwell', written over a light blue horizontal line.

Suzanne Caldwell  
Managing Director