



Human Trafficking and Modern Slavery Statement

Organisation

This statement applies to Stratherrick and Foyers Community Trust (SFCT). The information included in the statement refers to the financial year 2025.

Introduction

In October 2015, the Scottish Parliament passed the Human Trafficking and Exploitation (Scotland) Act 2015.

Human trafficking is about the illegal trade of human beings for exploitation. It also encompasses slavery, servitude and forced or compulsory labour.

The Act places a legal duty on large businesses with a turnover of £36million a year or more to undertake Human Trafficking and Modern Slavery reports and other specific actions. Businesses with a lower turnover, such as SFCT are advised to take the issue of the identification and reporting of suspicions of human trafficking and modern slavery very seriously.

Definitions

SFCT considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

SFCT acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. SFCT understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

SFCT does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to SFCT in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. SFCT strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Supply Chains

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited, and we procure goods and services from a restricted range of UK and overseas suppliers.

Potential exposure

Areas which are particularly relevant to SFCT include:

1. Looking at SFCT's supply chain to see if any of the firms we deal with may be complicit in slavery or people trafficking.
2. Ensuring none of SFCT's recruitment or agency staff agreements, or contracts with employees are in breach of the law, for example by paying below the legal minimum wage or requiring employees to work under terms including a threat of punishment.
3. SFCT must show it understands the issues around modern slavery and is aware that it has a role, ethically and legally in reporting incidents should directors, volunteers or staff encounter possible offences.
4. In turn, those who support SFCT, our members, funders and businesses we deal with all have an expectation (and for large businesses a legal requirement) to ensure that SFCT is aware and vigilant on modern slavery issues. SFCT should ensure that one

of its business ethics is to recognise and put in place a policy for identifying and reporting suspicions of Modern Slavery and Human Trafficking.

5. Additional vigilance should be given to areas including hospitality, grounds maintenance, building sub-contracting and cleaning, where cases of exploitation are more likely to arise. Workers in businesses or individual homes employed on a 'live-in' basis can be particularly vulnerable to exploitation.

In general, SFCT considers its exposure to slavery/human trafficking to be relatively limited. None the less, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps

SFCT carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

SFCT has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, SFCT has taken the following steps to ensure that modern slavery is not taking place:

- Ensure each director, volunteer and employee is aware that modern slavery and human trafficking is an issue in Scotland today.

- Ensure all directors, volunteers and staff are aware they must be vigilant and that they are required to report any potential cases to the CEO or the Chair of the SFCT. The CEO and/or SFCT Chair will decide whether to make a formal report or an anonymous report to the contacts listed on the Human Trafficking Aide Memoire pdf. or contact:
Email: human.trafficking@gov.scot
Phone: 0131 244 2693

Address: Human Trafficking Team, GWR, St Andrew's House, Edinburgh, EH1 3DG

- Display and maintain a Human Trafficking awareness poster at the Trust's property at the Wildside Centre, Whitebridge.

- Add and maintain a link to human trafficking and modern slavery aide memoire to the Trust's website.
- When posting tenders or procuring services, make sure our suppliers are aware that we require them to operate their businesses within the provisions of the Human Trafficking and Exploitation (Scotland) Act 2015.

Policies

The following policies are available to all staff through the SFCT intranet:

- Code of Conduct
- Bullying and Harassment Policy
- Diversity and Inclusion Policy
- Recruitment and Selection Policy

This statement was last reviewed on 1 December 2025 and will be reviewed every two years.