

# St Giles

Turning a past into a future

## St Giles Trust Modern Slavery Statement

2026 -2027



## CONTENTS

1. Introduction .....	3
2. Modern Slavery Act 2015 .....	3
3. Our Organisation .....	3
4. Definitions.....	4
5. Our Policies on Modern Slavery and Human Trafficking.....	4
6. Suppliers and Partners adherence to our values and ethics.....	5
7. Training and Awareness.....	6
8. Due Diligence and Next Steps.....	6
9. Signature.....	6

## 1. INTRODUCTION

Human rights are universal. This means that every person around the world deserves to be treated with dignity and have their interests considered equally. Governments have the duty to protect individuals against human rights abuses. The UN Guiding Principles for Business and Human Rights also outline the responsibility of businesses to respect human rights.

We welcome the increased focus of governments around the world on the issues of modern slavery and human trafficking. The international community rightfully expects businesses to focus on supply-chain risks in keeping with the United Nations Sustainable Development Goals and other international commitments. We acknowledge the measures to strengthen reporting requirements under the UK's Modern Slavery Act 2015, including embedding modern slavery risks and human trafficking throughout our activities, and the introduction of a public registry of modern slavery statements.

This statement applies to St Giles Trust registered charity 801355 and refers to the financial year 2025 – 2026.

## 2. MODERN SLAVERY ACT 2015

The Modern Slavery Act 2015 requires UK organisations to publish annual statements to report on the steps they are taking to ensure that modern slavery and human trafficking are not taking place in their operations and in the supply chains that provide their goods and services. Modern slavery is an overarching term used to describe a wide range of exploitation of labour, including slavery, forced or compulsory labour, servitude and other types of bonded labour, human trafficking and child labour.

## 3. OUR ORGANISATION

At St Giles Trust, we're more than just a charity; we're a community united by a shared mission. We use our expertise and lived experience to support people who are not getting the help they need. People who have been in similar situations to the people we help make up many of our staff. We empower and encourage each person to overcome the adversity they face, from the outside world and from within themselves. If they stumble, we are there to pick them back up.

We work across the UK providing a wide range of services for individuals, their families and their local communities.

From our humble beginnings in 1962 as a small London-based charity, St Giles now operates across the UK and offers a diverse range of services to our clients.

We want to see a society where everyone, no matter their background, has a positive future.

We have a governing board of trustees, who are committed to maintaining a high standard of corporate governance. They oversee the chief executive officer (CEO) and Executive team, who manage more than 400 staff across the organisation in England and Wales.

We are committed to complying with the provisions set out in the Modern Slavery Act 2015 and understand that this is an ongoing process in an ever changing world.

## 4. DEFINITIONS

We consider 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 or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restrictions placed on freedom of movement.

## 5. OUR POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING

Our wider framework of policies and procedures that support our commitment to the Modern Slavery Act 2015 is regularly reviewed which includes risk assessing and, where necessary, strengthening our existing policies and procedures to better address modern slavery issues.

We require that all colleagues, subsidiaries and affiliates operate in line with policies designed to safeguard and protect those who work with us, for us, and are impacted by our activities.

**Our aims are:**

- Not to directly support any organisation, initiative or activity that causes, promotes or contributes to modern slavery or human trafficking.
- Not to engage, contract or work with any entity or organisation that causes, promotes or contributes to modern slavery or human trafficking.
- To maintain risk-assessed and transparent supply chains.
- To remain aligned and co-operate with activities of the UK Anti-Slavery Commissioner.

**The policies relevant to the MSA (2015) include:**

### Safeguarding Policies

- Safeguarding Policy

Our Safeguarding Policy has been designed to minimise the risk of harm, exploitation or abuse of children and adults from staff, operations and programme activities. All staff, representatives and partner organisations are required to comply with this policy.

#### Finance Policies

- Conflict of Interest Policy
- Sustainable Procurement Policy
- Corruption Policy
- Fraud, Bribery and Theft Policy
- Investment Policy

We follow UK Institute of Fundraising Codes of Practice with regards to dealing with vulnerable individuals and ensure transparency at all levels regarding financial involvement.

#### Human Resource Policies

- Attendance and Leave Policy; to encourage all colleagues to take their annual leave entitlement, and where it has been necessary to work over contractual hours, that they are able to take time off in lieu.
- Code of Conduct and Professional Boundaries Policy
- Dignity at Work and Zero Tolerance Policy
- Whistleblowing Policy; this outlines processes and channels for reporting any concerns about practices without the fear of reprisals.

We also hold regular EDI drop-in sessions to provide a safe and confidential platform for colleagues to raise any concerns they may have.

## **6. SUPPLIERS AND PARTNERS ADHERENCE TO OUR VALUES AND ETHICS**

Modern slavery is particularly apparent in certain industries operating in specific regions of the world. A few examples of industries and sectors that are considered high-risk are food such as fish and seafood, cocoa and sugarcane farming, rice production, garments, and construction materials.

In the UK, relevant sectors that have a higher risk of modern slavery include hospitality, cleaning services, construction sites, farms and food processing facilities.

Our assessment of the overall risk of modern slavery posed to our business and supply chain is low, however the impact of the risk is high. Mitigation steps include:

- Enhanced support and training for colleagues working with external suppliers and partners to be able to identify signs of concern.

- Due diligence when setting up new suppliers and partners in line with MSA 2015 requirements.
- Implementation of our Sustainable Procurement Policy to ensure we do not enter into partnership with any organisation that exposes people to abuse and exploitation or is involved in any illegal activity.
- Removing any supplier or partner from our approved list where they, or others in their supply chain, are found to be in breach of MSA 2015.

## 7. TRAINING AND AWARENESS

All policies and procedures are stored centrally and accessible by all colleagues and promoted and enforced across the organisation.

All colleagues are required to undertake regular training either in person, online, or through eLearning packages, so that they can understand how to identify, respond to, and report, risks of modern slavery and trafficking.

St Giles Trust is also raising awareness of the issues by the continued roll out of posters in physical locations and sharing information on the intranet, ensuring individuals know what signs to look for, how to respond, where to escalate, and where they can seek additional support and guidance.

## 8. DUE DILIGENCE AND NEXT STEPS

As an organisation committed to supporting the most vulnerable in society, we are also committed to ensuring that how we operate, and the partners and suppliers we use are committed to providing fair and equitable treatment in line with Modern Slavery Act 2015.

We are committed to implementing the policies and procedures outlined in the documents, regularly reviewing them, and ensuring all those working for and with us have the training, guidance, and access to support and resources to continually improve our approach to identifying, responding to, and reporting and concerns or incidents relating to modern day slavery and trafficking.

## 9. SIGNATURE

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes St Giles Trust slavery and human trafficking statement for period March 2026 to March 2027.



Tracey Burley

CEO