

Stafford Sports and Performance Academy



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Policy Title:	SSPA Modern Slavery and Human Trafficking Policy
Policy Owner:	Stephen Glover
Date Approved/Updated:	July 2026
Version Number:	V1.0
Next Review Date:	June 2027

Version History			
Version	Date	Details of Change	Author
1.0	July 2026	Added SSPA front page & headers	ZP
1.0	July 2026	Document formatting updated	ZP

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1. POLICY STATEMENT

Stafford Sports and Performance Academy is committed to conducting business ethically, with integrity, and in accordance with all applicable laws. We have a zero-tolerance approach to modern slavery, forced labour, bonded labour, child labour, and human trafficking in all aspects of our business and supply chain.

As a sports business, we recognise our responsibility to respect human rights and to ensure that our operations, suppliers, contractors, and business partners uphold the same high standards.

We are committed to taking appropriate steps to prevent modern slavery and to promoting fair, safe, and lawful working conditions throughout our organisation.

2. PURPOSE

The purpose of this policy is to:

- Prevent modern slavery and human trafficking within our business and supply chains
- Set out the responsibilities of employees, contractors, suppliers, and business partners
- Ensure compliance with the UK Modern Slavery Act 2015 and other applicable legislation
- Promote ethical procurement and responsible business practices

3. SCOPE

This policy applies to:

- | | | |
|---------------------------|-----------------------------|---------------------|
| • All Employees | • Casual and agency workers | • Suppliers |
| • Directors | • Contractors | • Service providers |
| • Coaches and Instructors | • Consultants | • Business partners |
| • Volunteers | | |

4. OUR COMMITMENT

We will:

- Operate responsibly and ethically in all business activities
- Comply with the UK Modern Slavery Act 2015
- Not knowingly engage with organisations involved in slavery or human trafficking
- Assess modern slavery risks within our operations and supply chains
- Encourage transparency and accountability among suppliers
- Take appropriate action where concerns are identified

5. SUPPLY CHAIN EXPECTATIONS

We expect our suppliers and contractors to:

- Comply with all applicable employment laws.
- Pay workers fairly and lawfully.
- Prohibit forced, bonded, compulsory, or involuntary labour
- Prohibit child labour

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- Respect workers' rights to freedom of movement and freedom of association
- Maintain safe and healthy working environments
- Cooperate with reasonable due diligence requests

Where appropriate, suppliers may be asked to confirm compliance with this policy as part of procurement or contractual arrangements.

6. DUE DILIGENCE

To minimise the risk of modern slavery, we may:

- Assess suppliers before engaging them
- Include ethical standards within supplier agreements
- Review supplier practices where appropriate
- Investigate concerns raised by employees or third parties
- Terminate relationships where serious breaches are identified and cannot be remedied

7. EMPLOYEE RESPONSIBILITIES

All employees are expected to:

- Read and comply with this policy
- Remain alert to signs of modern slavery
- Report any concerns promptly
- Cooperate with any investigations

Managers have additional responsibility to ensure this policy is implemented within their areas of responsibility.

8. REPORTING CONCERNS

Anyone who suspects modern slavery or human trafficking is taking place in connection with our business should report their concerns immediately to:

- The Managing Director
- Designated Safeguarding Lead

Reports will be treated seriously and, where possible, confidentially. Individuals who raise genuine concerns in good faith will not suffer retaliation.

9. TRAINING AND AWARENESS

Where appropriate, employees involved in recruitment, procurement, supplier management, or operations will receive guidance on:

- Recognising indicators of modern slavery
- Reporting procedures

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- Ethical procurement practices

We will promote awareness of this policy across the organisation.

10. BREACHES OF THIS POLICY

Failure by employees to comply with this policy may result in disciplinary action.

Suppliers or contractors found to be involved in modern slavery or human trafficking may have their contracts reviewed, suspended, or terminated.

11. MONITORING AND REVIEW

This policy will be reviewed annually or sooner if required due to changes in legislation, business operations, or identified risks.

Approval

This policy has been approved by the Directors of Stafford Sports and Performance Academy

Policy Review

Policy to be reviewed June 2027