



Alliance Leisure Services Limited

Modern Slavery Statement 2021

Introduction

This Modern Slavery Statement relates to Alliance Leisure Services Limited ("ALS").

Detected cases of modern slavery within the UK are escalating. Forced labour is a hidden crime undertaken by exploitative individuals and criminal gangs. The prominence of the issue in our general lives, which has been highlighted through reports in social media, the press and brand statements, has led to an increase in the uncovering of a greater number of victims and has also highlighted the diverse range of industries affected by this blight. The criminals involved in this practice are becoming more cautious and devious in the ways in which they carry out the crime, and it is up to all of us to be aware of this issue, and to be vigilant about the ways in which it may happen within the areas in which we work and live.

ALS takes its responsibilities under The Modern Slavery Act 2015 extremely seriously. We understand that we cannot be complacent and that we need to ensure that we are constantly reviewing all areas within our business and supply chain to ensure that we are free from risk. We strive to ensure that engagement with all of our stakeholders (employees, customers, suppliers and the local community) is as transparent as possible in this area.

ALS has carried out a risk assessment to identify areas for concern. All members of staff, and colleagues in our supply chain are encouraged to share with us any concerns that they have identified, and we undertake to act upon any concerns we identify and/or which are raised with us.

First and foremost, exposing incidents of modern slavery helps victims and those who may become victims, but we believe that a focus on tackling modern slavery has a number of business benefits:

- protecting and enhancing our reputation and brand
- protecting our customers' brands
- growing our customer base as more consumers seek out businesses with higher ethical standards
- resulting in greater staff retention and loyalty based on values and respect
- developing more responsive, stable and innovative supply chains.

Who we are

ALS is one of the leading providers in the UK of facility development and marketing services to leisure services providers primarily in the public sector. ALS is a privately owned company with headquarters in Bristol. We employ approximately thirty people in the UK.

Policies relating to slavery and human trafficking

- ALS prohibits the use of forced labour or any form of human trafficking within its organisation or within its sub-contractors and third-party suppliers of goods and services.



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- All temporary staff must come from an approved employment agency. In order to be approved by us agencies must be GLA licenced with a robust stance and published statement on Modern Slavery and must evidence adherence to policies and processes for prevention of forced labour and human trafficking or any form of humiliating treatment.
- Under no circumstances are employment or recruitment agencies allowed to charge a fee for finding any person work within ALS. ALS has an open costing structure with a fair commercial commission / margin for the recruitment agency, to avoid any need for charges to be passed on to potential workers or employees.
- Under no circumstances are employment agencies allowed to withhold a workers' personal documentation or identification papers.
- All workers must be able to freely move around and give reasonable notice to leave the employment of ALS or the agency which employs them.
- Employment agencies are not permitted to make any unlawful charges to any worker.
- Employment agencies are required to verify that they will carry out suitable checks and audits for all staff to include:
 - ensuring a suitable level of English language to ensure that all health and safety, welfare and other policies to protect the worker, can be understood whilst on ALS premises
 - verifying Right to Work information
 - auditing multiple uses of a single address, phone number or bank account.
 - ensure that no worker is treated inhumanely or subject to coercion at any time.
 - having processes in place for whistle blowing and reporting of any concerns to the appropriate authorities.
- We reserve the right to audit all agencies for adherence to the above requirements and to be able to carry out checks on the agencies own processes.
- Our own internal employment processes are robust in ensuring that permanent, contracted and temporary staff are not at risk of any form of slavery or human trafficking.
- Our Staff Handbook contains commitments to operating ethically and without discrimination and explains how employees can raise concerns regarding any features of their employment.
- Our sourcing philosophy highlights how we expect to operate with suppliers in the supply chain and incorporates a reference to an ethical sourcing policy.
- Our sourcing policy sets out the requirement for all suppliers within our supply chain to adhere to the ETI base code and makes it clear that the exploitation or the breaching of human rights will not be tolerated.



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- We follow the recommendations of the 'Stronger Together' organisation to target and tackle hidden labour exploitation → Due diligence process in relation to slavery and human trafficking in our business and supply chain
- When dealing with suppliers which we consider to be a risk of breaching our requirements we may carry out an audit carried out prior to engaging in any contract. In addition, we have independent local employees to monitor and reinforce our policies. On occasion we also employ independent third-party auditors.
- We reserve the right to audit all employment agencies which provide labour to us in order to independently verify the recruitment practices in place and adherence to this policy.

Parts of our business and supply chain where there is a risk of slavery and human trafficking taking place, and steps taken to assess and manage this risk

- Within our business some staff work overtime; this is entirely voluntary.
- Our recruitment process involves the verification of identity and right to work. We never withhold the personal documentation or identification papers of an employee.
- We have extensive HR policies advising the employee and management of what is expected and acceptable in all areas. We provide a channel of communication for any issues directly to HR with anonymity preserved if required.
- We keep agency labour to the minimum required for our business, and where we do use temporary labour, we have defined processes which our agencies have to go through before employing someone on our behalf. This includes questions related to their management of modern slavery.
- On sites where temporary labour is used, we display and distribute 'Stronger Together' material in multiple languages, giving contact details for reporting labour exploitation. Audits are carried out through personal discussion with agency workers, during ad-hoc audits or induction of new agency workers.
- We provide information and coaching to our staff to assist them in identifying signs of modern slavery and guidance on how to report this internally and externally.
- Within our supply chain we operate with suppliers and manufacturers of finished or semifinished goods, including goods of a bespoke nature. We operate predominantly with suppliers of manufactured goods in UK and Europe, and with labour suppliers in the UK.
- All suppliers have received our Ethical Policy and Modern Slavery Statement and policy.

Measures of effectiveness in ensuring that slavery and human trafficking is not taking place

- We record all audits that have taken place and note any concerns raised during the process, verbal or written regarding human trafficking, forced labour or any breach of human rights.
- We also have time and attendance processes that monitor the hours our external teams and internal (non-staff / management) teamwork.



Training about slavery and human trafficking for our staff

- We aim to ensure everyone in the organisation is alive to the risks of modern slavery. This is to ensure that informed decisions are made in a timely way which mitigate and manage these risks, and to monitor the implementation of relevant policies.
- Employee communication and training:
 - This statement will be issued to all staff and re-issued each year and on induction.
 - Employees are provided with information on spotting signs of slavery and how to report their concerns
 - Managers that use temporary agency labour receive specific information to inform them of the nature and signs of modern slavery and are required to carry out audits of their sites.

How ALS responds to incidents of modern slavery

- If a specific case of modern slavery is identified, it should be reported (confidentially) to the police on 101 or The Modern Slavery Helpline on 08000 121 700 or www.modernslaveryhelpline.org/report. These numbers should also be used by any potential victim requiring support and advice. If potential victims are in immediate danger the 999, emergency number should be used.
- If any person within ALS suspects or experiences an issue relating to modern slavery and would like to confidentially discuss the situation prior to reporting as above, they are encouraged to speak to our Chief Executive of Managing Director.
- Please remember time is of the essence to protect the victim so please do not hesitate to make contact with someone who can help.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Alliance Leisure Services Limited slavery and human trafficking statement for the current financial year.

Signature

Signed: 
Paul Cluett (Nov 24, 2021 11:47:04M)

Date: Nov 24, 2021

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Position: Managing Director

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