

Modern Slavery Act Statement

This statement set out the steps taken to prevent modern slavery and human trafficking in our business in accordance with the Modern Slavery Act 2015.

Our Structure:

Halo Leisure Services Limited is a not for profit community leisure operator managing over 22 facilities in England and Wales, mainly in partnership with local authorities. Our head office is based in Leominster, Herefordshire and we were formed in 2002. Our annual turnover is in excess of £14m and we employ over 600 staff. We do not have any trading activity outside of the United Kingdom. We are an HMRC exempt charity for tax purposes.

Our Supply Chain:

Our supply chain mainly consists of the provision of goods to us from other organisations, all of which are based in the United Kingdom. These goods are required by us to deliver our services to our customers. The main areas of supply to us relate to repairs and maintenance, equipment, cleaning, utilities and catering. As part of our review for this statement we have identified that there are some items being sourced from our suppliers from outside the United Kingdom, such as uniform and maintenance parts.

Our procurement from these suppliers is a centralised function which requires the use of pre approved suppliers which means we have controls in place for committed expenditure and also the option to complete due diligence and retrospective checks. Our procurement policy is designed to ensure we operate in a legal and ethical manner. We expect all suppliers to commit to comply with all laws, regulations and our policies and terms of supply. We take a zero tolerance approach to abuse of human rights, slavery, servitude, forced or compulsory labour and human trafficking. Any supplier that fails to meet our standards will jeopardise their ability to trade with us and we may ultimately cease trading with any such supplier.

Safeguarding

We work closely with the community in all of our centres and we have noted that the most vulnerable groups in the UK for modern slavery could include migrant workers, illegal immigrants, asylum seekers, homeless people, travellers and people suffering from learning difficulties. We have detailed procedures, operating documents and training for safeguarding which educates our staff on modern slavery for the workplace and to help identify anyone in the community we believe may be at risk.

Our Teams

Halo Leisure has strict HR policies and procedures that ensure compliance with legislation and ensures fair and equal treatment, dignity at work and prevents discrimination. Our policies and operating documents are available to all staff on our info hub and staff app. We encourage all staff to report any activity they believe to be in breach of any of our operating standards or policies to us.

Due Diligence

We are committed to ensuring there is no modern slavery or human trafficking in any part of our business. We will:

- Identify and assess risks in our supply chain and ensure compliance from our suppliers.
- Provide training for our staff in these risks.
- Protect whistleblowers.

Link to:

Safeguarding Policy
Equality and Diversity Policy



Jon Huxley, Finance Director,
December 2022.

