



Open
To Create...

A sustainable social enterprise growing robust,
healthy & sustainable creative humans

Modern Day Slavery statement

- Modern day slavery is an insidious crime, that deprives a person's liberty and dignity for another person's criminal gain. It is a real, and growing problem for millions of people all around the world, including many individuals in global majority countries, who are being trafficked, kept and exploited in various forms of slavery.
- Across the UK modern day slavery is a growing issue that can affect people from every walk of life, but especially those who are already vulnerable and at risk.
- It vital then that as a micro social enterprise that Open To Create... Ltd., takes a zero-tolerance approach to modern day slavery and are fully committed to combatting modern day slavery and human trafficking in our operations with our team, clients and supply chain.
- Our statement sets out ongoing actions that we are taking to understand all potential modern day slavery risks related to our micro business and the steps we are taking to combat slavery and human trafficking.
- We commit to taking concrete steps to tackle modern day slavery, and to review this statement each year in April.

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Our business, our clients and supply chains

- Open To Create... Ltd. Is a limited company registered at UK Companies House 10015139
- As a social enterprise, micro business we work to benefit our local and wider communities, acknowledge and work to reducing the harm of the climate emergency, and puts our profits back our local and wider communities.
- We offer a range of charged for and pro bono community engagement, coaching, mentoring, wellbeing at work training, enterprise education, solution focused hypnotherapy & psychotherapy services to a range of creative individuals, community groups and institutions such as universities, umbrella agencies and creative partners.

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- We are physically based in Liverpool, UK, and work face to face with clients across the UK at their sites of operation. We work with clients located globally online via Zoom or Teams calls.
- We work to establish open, transparent working relationships based on building trust and co-maintaining integrity with all our team members, clients and suppliers.
- We use due diligence when choosing which team members, clients and suppliers to work with to make as sure as we can be of the client's and/or the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

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List of current clients with available Modern Day Slavery commitments / policies

London South Bank University

<https://www.lsbu.ac.uk/business/supply/modern-slavery-statement>

Liverpool John Moores University

<https://www.ljmu.ac.uk/legal/modern-slavery-act-transparency-statement>

Loughborough in London

<https://www.lboro.ac.uk/modern-slavery-statement/>

University of the Arts London

<https://www.arts.ac.uk/about-ual/public-information/slavery-and-human-trafficking-statement>

- On 1st June 2023 when reviewing of this document - we haven't been made aware of any allegations of human trafficking/slavery activities against any of our clients and/or suppliers, but if we were, then we would act immediately against the client or supplier and report it to the relevant authorities.

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Risk / benefit assessments

- As a micro business with employees, occasional freelance contractors, funded placement, or volunteer roles we work on a case-by-case basis during the recruitment process and when seeking to develop work with a client or making choices to engage a supplier.
- Given our work within a range of UK based universities we work inline to each institutions Modern Day Slavery statement and take the necessary steps during the procurement processes to provide all relevant company documentation, as requested.
- When it comes to sourcing suppliers our aim is to find the most transparent, social conscious provider of services, in line with our budgets and projects or company overall needs. Ideally, they will have a Modern Day Slavery statement that is kept up to date and is publicly available.
- In the case of smaller freelance and/or microbusiness suppliers we aim to invest in partnerships with locally based socially conscious businesses with clear commitments to ending Modern Day Slavery, alongside environmental harm.
- We work at a higher level to the UK Government's website best practice and advice via <https://www.gov.uk/government/collections/modern-slavery> and look to the best practice partnership working of Causeway via <https://www.wearecauseway.org.uk/>



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Policies

Open To Create... Ltd. Is in the process of developing the following policies for identifying and preventing modern day slavery and human trafficking in our operations:

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- **Whistleblowing Policy** - we encourage all employees, occasional freelance contractors, funded placement, or volunteer roles and clients, and suppliers to report any suspicion of slavery or human trafficking with an openness to work together to make the most appropriate changes to our practices and/or who we work with as clients or suppliers. We would encourage using <https://www.modernslaveryhelpline.org/> 0800 012 1700 to report concerns online
- **Code of Conduct** - our code encourages all employees, occasional freelance contractors, funded placement, or volunteer roles to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of all employee, occasional freelance contractors, funded placement, or volunteer roles conduct and ethical behaviour when operating with any client and/or supplier and managing our supply chain.

Due diligence

Open To Create... Ltd. has begun completing due diligence on clients and suppliers during on-boarding and on existing suppliers at regular intervals.

We are actively working to build in this statement into our work on other policies and procedures within the business to improve our ability to uphold our commitment to combat modern day slavery and human trafficking.

Awareness

Open To Create... Ltd. Is committed to raising awareness of modern day slavery issues by putting our statement into action at each stage of our work with potential clients and suppliers, where this is possible.

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- Using the UK Government's website best practice and advice via <https://www.gov.uk/government/collections/modern-slavery> and look to the best practice partnership working of Causeway via <https://www.wearecauseway.org.uk/>
- Learning about the range of red flags for potential cases of slavery or human trafficking
- Supporting any employees, occasional freelance contractors, funded placement or volunteer roles on how to flag up and report any suspicions of modern day slavery or trafficking i.e. by sharing how to whistle blow any concerns via <https://www.modernslaveryhelpline.org/> 0800 012 1700 to report concerns online

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Training

In addition to the awareness programme, Open To Create... Ltd. will include as part of any employees, occasional freelance contractors, funded placement, or volunteer role inductions

- This Modern Day Slavery statement
- How any employees, occasional freelance contractors, funded placement, or volunteer roles can identify the signs of slavery and human trafficking, including unrealistically low prices
- How any employees, occasional freelance contractors, funded placement, or volunteer roles should respond if they suspect slavery or human trafficking
- What external help is available for the victims of slavery via the UK Government's website best practice and advice via <https://www.gov.uk/government/collections/modern-slavery> and look to the best practice partnership working of Causeway via <https://www.wearecauseway.org.uk/>
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- How to take steps if a client or supplier fails to implement anti-slavery policies or controls
- Require direct consent from any employee, occasional freelance contractors, funded placement, or volunteer role that they will abide by our Modern Day Slavery statement.

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How will we track our progress

Open To Create... Ltd. will do the following to play our part in working to combat modern day slavery and human trafficking;

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- Make sure each any employee, occasional freelance contractors, funded placement, or volunteer role is given this statement at induction and required to sign off informed/direct consent that they have read, understand, and stand for putting the statement into practical use
- Check out each client and / or supplier on a case by case basis i.e., due diligence is done to check out each client and / or supplier Modern Day Slavery statements, and credentials
- Build into our Safeguarding policy, and other working policies the practical steps we can take to combat modern day slavery and human trafficking i.e., link our Safeguarding policy to how our local council tackles safeguarding concerns linked to Modern Day Slavery and trafficking <https://fsd.liverpool.gov.uk/kb5/liverpool/fsd/advice.page?id=pLEIoNdJrCg> Modern Day Slavery hotline via <https://www.modernslaveryhelpline.org/>
- Keep clear records of any reporting in line with ICO record keeping and data protection best practice.

This statement was re-written, after review and signed off by

Anna B. Sexton, Director of Open To Create... Ltd.

Reviewed 1st June 2023

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