



Modern Slavery and Human Trafficking Statement

1. Introduction

HEY Smile Foundation is committed to acting ethically, responsibly and transparently in the way we operate and in the relationships we have with suppliers, partners, contractors and organisations we support.

We recognise that modern slavery can take many forms, including slavery, servitude, forced or compulsory labour, human trafficking and exploitation.

Although HEY Smile Foundation is not currently required to publish a statement under Section 54 of the Modern Slavery Act 2015 because our annual turnover is below the statutory threshold, we believe it is good practice to set out our approach clearly.

We are committed to taking proportionate and practical steps to reduce the risk of modern slavery and exploitation within our organisation and supply chains.

2. About HEY Smile Foundation

HEY Smile Foundation is a charitable organisation working across Hull, the East Riding of Yorkshire and the wider Humber area.

We support voluntary, community and social enterprise organisations through infrastructure support, community development, volunteering, partnership working, grant administration, organisational development and strategic representation.

Our work involves relationships with a wide range of organisations, including:

- local charities and community organisations;
- local authorities and public bodies;
- funders and commissioners;
- businesses and corporate partners;
- professional advisers;
- contractors and suppliers;
- venues and facilities providers;
- IT, communications and other service providers.

Our supply chain is predominantly UK-based and largely consists of professional services, premises and facilities, technology, equipment, events, training and operational support.

3. Our commitment

HEY Smile Foundation has zero tolerance for modern slavery, human trafficking, forced labour or exploitation.

We expect the same standards from those we work with. We will take reasonable and proportionate steps to:

- identify and understand potential risks;
- work with reputable suppliers, contractors and partners;
- ensure appropriate recruitment and employment practices;
- encourage concerns to be raised;
- act where concerns are identified;
- cooperate with statutory agencies where necessary.

Our approach is proportionate to the nature, scale and risk profile of our activities.

4. Policies and organisational controls

Our approach to preventing modern slavery is supported through wider organisational policies and procedures, including arrangements relating to:

- safeguarding;
- safer recruitment;
- right-to-work checks;
- whistleblowing and speaking up;
- staff conduct and professional boundaries;
- procurement and purchasing;
- equality, dignity and respect;
- data protection and information governance;
- risk management.

Where relevant, we will consider modern slavery and exploitation risks alongside safeguarding, recruitment, procurement and partnership risks.

5. Recruitment and employment

HEY Smile Foundation is committed to fair and lawful recruitment and employment practices.

Appropriate checks are undertaken before employment begins, including identity and right-to-work checks where required.

We do not knowingly engage individuals or organisations that use forced, compulsory or trafficked labour.

Employees and workers are provided with appropriate information about their roles, responsibilities and terms of engagement.

Where recruitment agencies or external providers are used, we expect them to operate in accordance with applicable employment and modern slavery legislation.

6. Supply chain due diligence

Our supply chain is relatively limited. We adopt a proportionate, risk-based approach to supplier due diligence.

This may include consideration of:

- the nature of the goods or services being supplied;
- the location and structure of the supplier;
- the use of subcontractors;
- employment and labour practices;
- relevant safeguarding or ethical concerns;
- any known regulatory or reputational issues.

Higher-risk suppliers or arrangements may be subject to additional scrutiny.

Where appropriate, we may request assurance that suppliers and contractors comply with relevant legislation and maintain appropriate policies and practices in relation to modern slavery and human trafficking.

7. Areas of potential risk

We recognise that some sectors and supply chains may present a greater risk of modern slavery than others.

Potential areas of risk relevant to our operations may include:

- cleaning and facilities services;
- construction, maintenance and property-related services;
- hospitality and events;
- temporary or agency labour;
- clothing and merchandise;
- technology hardware and equipment;
- outsourced operational services.

We will consider these risks when selecting suppliers and entering into significant contracts or partnerships.

8. Safeguarding and exploitation

Modern slavery is also a safeguarding issue.

Through our work with communities and voluntary organisations, staff and volunteers may become aware of indicators of exploitation, coercion or trafficking.

Where concerns arise, they will be managed through HEY Smile Foundation's safeguarding arrangements and referred to appropriate statutory agencies where necessary.

Where there is immediate danger, emergency services will be contacted.

9. Reporting concerns

Staff, volunteers, trustees, suppliers and partners are encouraged to raise concerns about suspected modern slavery, exploitation or unethical practices.

Concerns can be raised through:

- line management;
- the Designated Safeguarding Lead;
- senior management;
- the Chief Executive;
- the Chair of Trustees;
- whistleblowing arrangements.

Concerns raised in good faith will be taken seriously.

Where appropriate, concerns may be referred to the police, local authority safeguarding services, the Gangmasters and Labour Abuse Authority or other relevant authorities.

10. Training and awareness

HEY Smile Foundation will promote appropriate awareness of modern slavery and exploitation among staff whose roles may bring them into contact with relevant risks.

This may include awareness within:

- safeguarding training;

- induction;
- recruitment and HR processes;
- procurement activity;
- contract management;
- grant administration;
- partnership working.

Training and awareness will be proportionate to role and level of risk.

11. Monitoring effectiveness

We will monitor the effectiveness of our approach through proportionate measures, which may include:

- review of safeguarding concerns;
- review of whistleblowing concerns;
- supplier and contractor due diligence;
- review of recruitment and right-to-work processes;
- review of relevant policies;
- consideration of emerging risks;
- review of any incidents or lessons learned.

Where weaknesses are identified, appropriate action will be taken.

12. Continuous improvement

We recognise that preventing modern slavery is an ongoing responsibility.

We will continue to improve our approach by:

- reviewing relevant policies and procedures;
- strengthening supplier due diligence where appropriate;
- improving staff awareness;
- responding to changes in legislation or guidance;
- learning from incidents and sector good practice.

13. Governance and approval

Responsibility for oversight of this statement sits with the Board of Trustees and Senior Leadership Team of HEY Smile Foundation.

This statement will be reviewed annually, or sooner where there is a significant change in legislation, organisational activity or identified risk.

Approval date: 8 October 2026

Review date: October 2028

Signed: Jamie Lewis MBE, Chief Executive