

# Saada

## Smaller Authorities' Audit Appointments

### Modern Slavery Statement

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## Modern Slavery Statement

### 1. Introduction

- 1.1. Small Authorities' Audit Appointments (SAAA) recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is committed to ensuring that such practices have no place in its own business, its supply chain or other activities.
- 1.2. SAAA supports the requirements of the Modern Slavery Act 2015 and opposes modern slavery and human trafficking.

### 2. Organisational structure and supply chains

- 2.1. This statement covers all activities of SAAA, which operates only within England.
- 2.2. SAAA is responsible for discharging the functions of the specified person appointed by the Secretary of State for Housing Communities and Local Government under the Local Audit (Smaller Authorities) Regulations 2015, including (but not limited to):
  - 2.2.1. issuing an invitation to all relevant Smaller Authorities to become an opted-in authority;
  - 2.2.2. appointing the external auditor to all opted-in Smaller Authorities;
  - 2.2.3. specifying scales of fees for the audit of accounts of opted-in authorities; and
  - 2.2.4. managing compliance by local auditors with the requirements of the SAAA audit services contracts.
- 2.3. SAAA is a small company with a Board of eight non-executive directors and two staff. The key elements of its supply chains are contracts for audit services with audit firms.

### 3. Definition of modern slavery

- 3.1. The term 'modern slavery' captures a whole range of types of exploitation, many of which occur together. These include but are not limited to:
- 3.2. **Sexual exploitation:** this includes sexual abuse, forced prostitution and the abuse of children for the production of child abuse images/videos.
- 3.3. **Domestic servitude:** this involves victims being forced to work in usually private households, performing domestic chores and childcare duties.
- 3.4. **Forced labour:** this can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars).
- 3.5. **Criminal exploitation:** this can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shop-lifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker.
- 3.6. **Human trafficking:** this requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The

offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

- 3.7. **Other forms of exploitation:** organ removal; forced begging; forced benefit fraud; forced marriage and illegal adoption.

#### 4. Risk assessment and due diligence

4.1. SAAA is committed to ensuring that modern slavery does not occur in our business. Its procedures include:

4.1.1. Robust recruitment procedures for substantive staff and agency workers. This process is compliant with UK employment legislation and includes pre-employment checks, for example 'right to work' document checks, obtaining references and understanding any employment gaps. Disclosure and Barring Service (DBS) checks would be undertaken for relevant posts, e.g. finance manager.

4.1.2. Reporting knowledge or suspicion of criminal activity (including slavery or human trafficking) through our whistleblowing procedures, which ensure that employees can raise their concerns confidentially.

4.1.3. A mandatory e-learning module for all staff on how to tackle and spot modern slavery.

4.2. SAAA has procedures in place that contribute to ensuring that its suppliers understand its values and ethics in relation to modern slavery. These requirements will be incorporated in SAAA's contract terms and will specify a supplier's contractual obligation concerning modern slavery.

#### 5. Our policies

5.1. SAAA operates the following policies that support its approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in its operations:

5.1.1. **Whistleblowing policy:** SAAA encourages all its employees and those employed on a contract for service or through an agency to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. SAAA's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation. Workers who have concerns can raise their concerns confidentially in writing or schedule a meeting with the Chief Executive accompanied by a trade union representative or fellow worker.

5.1.2. **Awareness-raising:** SAAA raises awareness of modern slavery issues by requiring staff to complete an e-learning module on modern slavery. This module covers the basic principles of the Modern Slavery Act 2015; how employers can identify and prevent slavery and human trafficking; what employees can do to flag up potential slavery or human trafficking

issues to the relevant parties within the organisation; and what external help is available, for example through the [Modern Slavery Helpline](#).

## **6. Implementation and effectiveness**

6.1. SAAA has taken the following actions to implement its statement on modern slavery:

6.1.1. we have reviewed and updated all relevant corporate and human resources policies in relation to modern slavery requirements;

6.1.2. we have reviewed and updated our procurement procedures and related documentation; and

6.1.3. all staff have completed e-learning training on modern slavery.

## **7. Review**

7.1. SAAA will continue to review its business operations to identify any parts that may be at risk of modern slavery and human trafficking and will update this statement periodically in light of this as required.