Lincolnshire Co-operative Ltd
Statement under the Modern Slavery Act 2015

Introduction
We are committed to tackling Modern Slavery and so reducing the opportunities for people to be exploited in our communities. We also seek, through our approach (by being helpful, inspiring and trustworthy) to raise awareness of this, and how we can work together to make an impact on this unacceptable practice.

We are required under the Modern Slavery Act 2015 to publish annually the steps we have taken and continue to take, to ensure that we are doing all we can to prevent incidents of Modern Slavery & Human Trafficking occurring.

Modern Slavery is regarded as the fastest growing criminal activity in the world, and takes a number of forms, such as:

- Forced Labour
- Sexual Exploitation
- Domestic Servitude
- Criminal Exploitation

Our Business and Supply Chain
We are an independent co-operative based in Lincoln with over 280,000 members and 219 outlets offering a wide range of services including Food Stores, Pharmacy, Travel, Funeral Homes, Post Offices and a Florist. We predominantly trade in Lincolnshire and also have sites in Norfolk, Nottinghamshire and Yorkshire.

We are conscious that we predominantly trade in a rural area, with a high population of migrant workers, and as such recognise that we operate in a potentially high-risk geographic region for opportunities of Modern Slavery to occur.

The majority of the goods available in our Food Stores are supplied to us by the Co-operative Group, and sourced and comprehensively vetted by their ethical trading team. A copy of their Modern Slavery statement can be viewed at www.co-operative.coop/ethics/modern-slavery

We continue to review the processes of our core suppliers, and have not identified any activities which are at high risk of Modern Slavery.

We also seek to promote products made by our local suppliers, and as we source their products directly, we aim to ensure their processes are free from Modern Slavery. Our procurement and buying managers promote this message as part of their relationship with any potential suppliers and carry out site visits to anyone prospective supplier’s premises.

We ask local suppliers to complete a Modern Slavery audit before we engage with them. We also ask them to complete our on-line ‘Modern Slavery’ E-learning package (which has been endorsed by Lincolnshire Police), once we look to place their goods in our stores. The E-Learn, which we proactively commissioned through an external independent company, seeks to not only promote best practice, but also to raise awareness of the possible indicators of Modern Slavery. To date, 40 local suppliers have completed the E-Learning, leaving very positive feedback and stating the steps they would be taking themselves to prevent Modern Slavery in their own businesses.

Our Policies & Procedures
To ensure we conduct our business in an ethical and transparent way, we have put in place a number of internal policies:

- We operate a robust recruitment policy, including carrying out eligibility to work in the UK checks for all prospective colleagues, to safeguard against Human Trafficking or individuals being forced to work against their will.
- Our Whistleblowing policy is designed to ensure that all our colleagues know that they can raise concerns confidentially about how people are being treated, or practices within our business or our supply chain, without fear of any reprisal.
- Our intranet has a dedicated section on Modern Slavery, designed to raise awareness and the profile of this subject with our colleagues, and provide a means of reporting any concerns or information they may wish to pass on to us.

We are committed to continually reviewing and updating our policies, procedures and processes to identify and mitigate any risk to our business.

Training & Raising Awareness
We recognise that our greatest asset is our colleagues, and we have taken steps to ensure they are aware of Modern Slavery and know how to recognise and act on any suspicions they may come across not only in their workplace, but in everyday life.
To date, over two thousand of our colleagues (90%), across all levels of the business, have now completed another internal version of our Modern Slavery E-learning package, with feedback including:

“**This module has certainly made me stop & think about this subject**”

“A real eye-opener to the world of slavery I previously had no knowledge of”

“I feel more confident on this subject now”

We have attended Modern Slavery events at The Wilberforce Institute in Grimsby, and ‘Stronger Together’ sessions in both Grimsby & Spalding, where we were shown best practice in tackling Modern Slavery in business and supply chains. Representatives of Lincolnshire Police’s Modern Slavery Team have also attended sessions with our Travel and Post Office colleagues to further raise awareness of this issue.

Modern Slavery Day is acknowledged by us each year on the 18th October, when we share information on our internal Colleague App to raise awareness with our colleagues.

**Additional Steps**
As well as establishing due diligence through our main supply chain, we also chose to increase the opportunity to raise awareness of Modern Slavery extending this to other areas of our business.

We have asked our approved contractors and general suppliers to complete our Modern Slavery E-Learning, or where they already have an existing policy or statement on Modern Slavery, to let us see that. Those companies completing the E-Learn to date have left comments after completion of:

“**Excellent course**”

“Since taking this course we will be discussing Modern Slavery with many of our own suppliers”

We plan to invite our commercial tenants to complete the E-Learn module to further satisfy ourselves as a business that our tenants have an awareness of the issue of Modern Slavery.

We have maintained our good relationship with Lincolnshire Police’s Modern Slavery Team meeting periodically to share best practice and information.

We have also engaged with ‘Crimestoppers’ Charity, using their latest Modern Slavery publication, which is a multilingual information sheet both in English and Eastern European languages, directed at individuals from those countries and advising how they can obtain assistance or report Modern Slavery.

**How We Measure Success & Progress**
We know the steps we are taking in relation to Modern Slavery have been effective as no reports have been received from colleagues, the public or law enforcement agencies to suggest Modern Slavery practices have been identified.

We are also able to measure progress by:

- The increased number of our colleagues who have completed our Modern Slavery E-Learning.
- The increased awareness of Modern Slavery our colleagues have demonstrated since completing the E-Learn package.
- Supplier, Local Supplier & Contractor awareness raised by the completion of the Modern Slavery training facilitated by us, allowing us to produce data on completion rates and measures taken to reduce exposure to both our and their businesses.

We take a zero-tolerance approach to Modern Slavery in any form, and are committed to acting ethically, transparently and with integrity in all our business operations.

**Approval for this statement**
This statement was approved by the Board of Directors on 28th October 2019.

Signed

Rev Barbara Hutchinson, President