



Auntie's Cookery Academy

Modern Slavery Policy Statement

Auntie's Cookery Academy is dedicated to empowering vulnerable young people aged 18 to 25 by equipping them with vital life skills and employability training, ultimately aiming to foster confidence and independence and enable them to flourish. In alignment with this mission and its commitment to ethical practice, Auntie's Cookery Academy adopts a **zero-tolerance approach to modern slavery**. ACA is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere in its own operations or in any of its supply chains.

This policy aims to ensure transparency in our own business and in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers, and other business partners.

1. Scope

This policy applies to all individuals working for or on behalf of Auntie's Cookery Academy, including employees, officers, directors, prospective employees, former employees, contractors (including sub-contractors and their employees), suppliers (including their employees), consultants, auditors, associates, and relatives/dependents of any of the above. It is intended to apply in all countries in which the Academy operates a business.

2. Understanding Modern Slavery and Human Trafficking

Modern slavery encompasses slavery, servitude, forced and compulsory labour, and human trafficking. It involves the exploitation of individuals through coercion, deception, or abuse of vulnerability for profit.

Auntie's Cookery Academy acknowledges that care-experienced young people, such as those it serves, may be particularly vulnerable to exploitation. This includes risks related to "County Lines" (exploitation by gangs for drug trafficking) and "Cuckooing" (where homes are taken over for illegal activities), which exploit children and young adults, especially those with disabilities or those at risk of homelessness. "Trafficking" is also recognised as an extra-familial harm. The Academy is committed to protecting "At Risk adults" and young people from such forms of exploitation.



3. Due Diligence in Our Operations

Auntie's Cookery Academy ensures fair and ethical treatment of all its staff, volunteers, and learners. Our commitment to safeguarding and promoting the welfare of all apprentices and learners ensures they can access our services, premises, and facilities without fear of harm and are protected from mistreatment and abuse. Our safeguarding approach is risk-based and proportionate, particularly for adult learners who may be "At Risk".

We implement **safer recruitment practices** to ensure that everyone working or volunteering with our young people is safe to do so, adhering to guidance such as *Keeping Young People Safe in Education*. This involves interviews, references, checks on work history gaps, and criminal records checks (DBS where required).

4. Supply Chain Due Diligence

Auntie's Cookery Academy expects its contractors, suppliers, and other business partners to uphold the same high standards regarding modern slavery. Our procurement process includes specific measures to ensure compliance:

- **Initial Assessment:** All new suppliers are required to confirm that they have a Modern Slavery policy in place. Auntie's Cookery Academy will review this policy to ensure it meets our standards and demonstrates a commitment to preventing modern slavery within their business.
- **Regular Review:** Approved suppliers undergo regular review via contract review meetings, held at least annually. If any supplier fails to meet our expectations or is unwilling to make necessary changes, we may cease to engage with them.
- **Contractual Provisions:** Our standard contracts include:
 - Warranties confirming no slavery is used anywhere in the supplier's business or by any of its sub-suppliers.
 - A contractual right to request compliance-related information and to audit suppliers at our discretion.
 - Indemnity provisions and rights to terminate for breach of our Anti-Slavery policy.

5. Training and Awareness

Auntie's Cookery Academy is committed to providing **training and information to relevant staff, volunteers, and employers** to enhance their understanding of modern slavery risks and prevention. This includes ensuring that:

- Relevant staff are made aware of the risk factors, implications of the Modern Slavery Act, and the implementation of this policy in their areas of responsibility.
- Modern slavery and human trafficking elements are integrated into other relevant training programmes, such as recruitment and selection, equality and diversity,



procurement and supply chain management, and safeguarding. Our safeguarding team regularly attends relevant Prevent training and collaborates with employers to safeguard learners from radicalisation.

6. Reporting Concerns

A culture of openness and accountability is essential to prevent and address illegal or unethical conduct. Auntie's Cookery Academy encourages all individuals to **report any genuine concerns related to suspected wrongdoing or dangers**, including those pertaining to modern slavery.

Our Whistleblowing Policy provides a clear framework for reporting concerns about serious wrongdoing. Individuals can report concerns to their Line Manager, the Designated Safeguarding Lead, or a Trustee. Reports can also be made confidentially via email to hello@auntiescookeryacademy.org. Reports will be handled in line with our policy, and confidentiality will be maintained wherever possible.

A fair assessment of any concern can only be made if the evidence is entirely the reporter's own. If cheating or plagiarism is suspected, the relevant policies will be followed.

Auntie's Cookery Academy is committed to ensuring that anyone who makes a disclosure in good faith is treated fairly and does not suffer detriment. Victimisation of an employee raising a concern is unacceptable and will be managed according to the disciplinary policy.

For concerns specifically about the welfare of a learner who may be at risk of harm from modern slavery or exploitation, staff should follow the safeguarding reporting procedure by immediately informing a member of the Safeguarding Team and recording the concern on the Safeguarding Monitoring Form. Information regarding safeguarding risks can be shared with statutory agencies such as the Police, Local Authorities, or Courts, even without consent, when legally required.

7. Performance Measures

To ensure continuous improvement and accountability, Auntie's Cookery Academy will measure its efforts in tackling modern slavery through organisational performance measures, which may include:

- **Supplier Compliance:** Demonstrating that suppliers have a modern slavery policy and are compliant with it.
- **Incident Reporting and Resolution Rate:** Tracking the number of modern slavery incidents reported versus those resolved satisfactorily.
- **Risk Mitigation Rate:** Identifying high-risk suppliers or supply chain segments and demonstrating where risk mitigation measures have been implemented.
- **Training Effectiveness:** Demonstrating that employees and suppliers are trained on modern slavery awareness.



8. Policy Review

This policy will be reviewed **at least once every 12 months**, or sooner if:

- Relevant laws, regulations, or guidance change;
- A serious incident, complaint, or near miss occurs;
- Feedback from learners, staff, or partners suggests improvements; or
- Operational changes make an update necessary.

This includes review if supplier practices or legislation change.

Signed: 

Printed Name: Emily-Jane Dale

Job Title: CEO and Chair

Date: 29th October 2025