

Brookwood Memorial Halls

Management Committee Statement regarding Modern Slavery, Proceeds of Crime and Money Laundering.

Corporate and public bodies are increasingly required to perform due diligence that the entities they interact with have controls in place to mitigate the risk that they could be used to support unethical or illegal activities. Whilst the Hall is not required to have formalised controls and procedures, a Management Statement demonstrating the Management Committee's continuing awareness and vigilance of such risks is appropriate.

Management Statement: The Management Committee of Brookwood Memorial Halls is aware of the issue of modern slavery and human trafficking, and reaffirms its intent to remain observant for it, as also for other illegal or unethical behaviours such as money laundering or handling proceeds of crime. The Committee members will remain alert over the activities of our suppliers, service providers or clients for suspicious activities giving rise to concerns of such activity, and is aware of its obligations to report suspicions to the relevant authorities.

ANALYSIS: Section 54 of the **Modern Slavery Act** 2015 is the key relevant legislation. Legal guidance states that the Act applies if:

- *it is a commercial organisation (this means a body corporate or a partnership) which supplies goods or services;*
- *it carries on its business or part of its business in the UK (Home Office Guidance relating to the Act (see below) clarifies that, if an organisation does not have a "demonstrable business presence" in the UK, it will not fall within section 54); and*
- *it has a total annual worldwide turnover of £36 million or more (this must take into account the turnover of any subsidiary companies).*

Source: <http://www.geldards.com/the-modern-slavery-act-2015---how-will-section-54-affect-your-organisation.aspx>

The UK Money Laundering Regulations and the Proceeds of Crime Act require individuals who become suspicious that activities involve the proceeds of crime or corruption, to report their suspicions to the police.

BACKGROUND and guidance:

The **Modern Slavery Act** encourages businesses to tackle issues around modern slavery. The Management Committee should take appropriate steps to try and ensure that there is no slavery or human trafficking taking place anywhere within our organisation or activities. We should endeavour to ensure by observation and when deemed appropriate, by enquiry, that none of our suppliers, service providers or users of our premises is involved in or associated with any activities that:

- disrespect the values and human rights of their employees, and the employees of its supply chain;
- comply with the relevant legislation in the countries and communities in which they work;
- never use child labour;
- never use forced or involuntary labour, through slavery, servitude, forced or compulsory labour, human trafficking or any other means;
- make sure working hours are within local regulations and industry practices; or
- respect the legal rights of employees to join, or decide not to join, worker organisations and associations.

We should expect all our third parties to manage their activities in a fair and ethical way, to be alert to the risk that their activities may have contact with people affected by unethical pressures, and to be aware of how to deal with such suspicions. We should recognise that slavery and human trafficking are crimes. And that any benefits people get from those actions are proceeds of crime. We should recognise our responsibility to detect, to discourage and to prevent anybody using our financial systems to launder these proceeds. And we recognise our obligations to report any suspicions of such activity promptly to the authorities.

Money Laundering And Proceeds of Crime – Reportable suspicions could arise for example from offers to provide or to purchase goods or services at unusually low or high cost or through unusual manner. For example, offering to over-pay for services we provide and asking for the excess to be repaid to the purchaser or to another person. Third party payment for services would be unusual and could give rise to suspicion that the recipient of services is paying the purchaser separately in exchange for another arrangement between them. Offering goods at unusually low prices could give rise to suspicion that the goods were acquired illegally.

We should discuss and formally review this statement at least annually to affirm it and to ensure that our Management Committee members are familiar with the issues and how to deal with issues arising.

Reviewed and approved by the Management Committee 4 Feb 2019