Foundation for Credit Counselling Modern Slavery Statement 2024

Foundation for Credit Counselling (of 123 Albion Street, Leeds, LS2 8ER) trades as StepChange Debt Charity and StepChange Debt Charity Scotland.

A registered charity under nos.1016630 and SC046263; we are a limited company registered in England and Wales (company no: 2757055), which is authorised and regulated by the Financial Conduct Authority. StepChange is the parent company of:

- Consumer Credit Counselling Service (Equity Release) Limited trading as StepChange Financial Solutions (company no. 06741879); and
- Consumer Credit Counselling Service Voluntary Arrangements Limited trading as StepChange Voluntary Arrangements (company no. 05659160).

We recognise the importance of combating slavery and human trafficking and are committed to reviewing on an ongoing basis the way in which we obtain our services and how each supplier relationship is managed, in order to keep our supply chain ethical.

As the leading debt advice charity in the UK, we have 1,097 colleagues (as of 14 January 2025) working in seven locations across England, Wales and Scotland. The majority of colleagues are directly employed and are generally not in a category that could be perceived as vulnerable to modern slavery. Therefore, our key focus is to ensure that the Charity has adequate policies and due diligence procedures in place for our supply chain.

The Charity's supply chain network provides services which support the delivery of our day-to-day debt advice and debt management operations. Via a centralised Procurement team, the charity has implemented a review and revision of the full Procurement and Supplier Management Policy which is now in place with a set of standards and procedures to ensure such practices do not take place within the charity nor within the business of any organisation that supplies goods or services. The Charity has undergone an internal audit of the Policy and identified any risks or exposure.

Key supplier relationships and contracts are actively managed to ensure suppliers continue to adhere to the Modern Slavery Act 2015 for the duration of the relevant contract term, this includes onboarding due diligence, supplier reviews and supplier adherence to our values

The Charity has a zero-tolerance approach to known issues pertaining to slavery and human trafficking; as such all colleagues are expected to report any concerns immediately - these will be fully investigated with action taken where required.

A number of internal policies and procedures are also embedded across the Charity and are regularly reviewed. These include:

- Procurement and Supplier Management Policy and framework – This covers the full procurement process including ethical procurement and the Modern Slavery Act 2015.
- Risk Management – we have a robust risk management framework embedded across the Charity that ensures that risks are appropriately identified, assessed, and managed in line with the Charity's agreed risk appetite. This includes supply chain risk.

- Whistleblowing ('Speak Up') Policy – we encourage colleagues to report any concerns without the fear of retaliation. Concerns can be raised through an independent third party, which provides the option for the whistleblower to have anonymity if desired.
- Employee Code of Conduct – this sets out the behaviours we expect from colleagues when representing the Charity during their daily activities. As such we expect them to act with integrity and in an ethical manner.
- Recruitment Policy – all colleagues and Trustees are recruited through a selection process that is carried out fairly and consistently considering equal opportunities, recognised good practice and the needs of the Charity. All colleagues are paid in excess of the Minimum Wage, and the Real Living Wage. In addition, the Charity does not enlist the help of volunteers in the operation of the Charity.

In order to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have embedded due diligence procedures in respect of both our business-to-business suppliers and our HR and recruitment activities. These include supplier questionnaires, risk assessments, contractual commitments, and the right to conduct audits.

Our procedures are designed to:

- Establish and assess areas of potential risk in the Charity and supply chains including the monitoring of potential risk areas.
- Reduce the risk of slavery and human trafficking occurring within the Charity and supply chains.
- Provide adequate protection for whistle-blowers.

In order to determine the effectiveness of managing Modern Slavery the Charity considers the following:

- Code of Conduct completion rate: 97.26%
- Number of instances of modern slavery reported within the company or our supply chain: 0

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. All colleagues are required to complete e-learning modules encompassing both Code of Conduct (including whistleblowing) and Risk Management, and we will be expanding the content in 2025 to specifically cover modern slavery.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Charity has taken to ensure that slavery, forced labour and human trafficking are not taking place in our supply chain or in any part of our organisation.

This statement was approved by the Board of Trustees on 26 February 2025

Name: *Lesley Titcomb, Chair of the Board of Trustees*

Signature: 