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| **TITLE** | **Ant-Slavery and Human Trafficking Policy** |
| Policy ref | LG004P |  | Approval date  | February 2023 |
| Owner | Director of Legal & Compliance |  | Planned review date | February 2026 |
| Approved by | Audit & Risk Committee on behalf of the Abbeyfield Board |

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| **Version** | **Purpose/change** | **Author** | **Date** |
| 1.0 | New policy | Petra Taylor | November 2019 |
| 2.0 | Policy reviewed, including amends to the policy objectives, the addition of a new section (4.1) on TAS’s anti-slavery objectives and linking in the Anti-Slavery and Human Trafficking Statement. | Petra Taylor | November 2022 |
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| **1 Background** | Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.  |
| **2 Objectives** | The aims of this policy are to: * set out the responsibilities of The Abbeyfield Society (TAS), and of those working for and on its behalf, in observing and upholding its position on modern slavery and human trafficking; and
* provide information to those working for and on TAS’s behalf on how to identify and report concerns regarding modern slavery and human trafficking.
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| **3 Scope** | This policy applies to all persons working for or on behalf of TAS in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and it may be amended at any time.  |
| **4 Policy****4.1****4.2****4.3****4.4****4.5** | **Objectives**TAS has a zero-tolerance approach to modern slavery and 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 modern slavery is not taking place anywhere its own business or in any of its supply chains.TAS is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. It expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, it includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and it expects that its suppliers will hold their own suppliers to the same high standards. **Responsibilities**The CEO has overall responsibility for ensuring this policy complies with TAS’s legal and ethical obligations, and that all those under its control comply with it.The Director of Legal & Compliance has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.Comments, suggestions and queries are encouraged and should be addressed to the Director of Legal & Compliance.**Compliance with the Policy**All staff must ensure that they read, understand and comply with this policy and accompanying procedure.The prevention, detection and reporting of modern slavery in any part of TAS’s business or supply chains is the responsibility of all those working for it or under its control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.If an individual believes or suspects that a conflict with this policy has occurred, or may occur in the future the procedure below should be followed: * Report the concerns either verbally or in writing to their immediate manager;
* If they feel you cannot report the issue to their immediate manager, they should report the case to a more senior manager/director;
* If they feel that they cannot report the matter to their immediate or more senior manager/director, they can report the matter to HR or any other senior manager/director of their choice within Abbeyfield.

In the event of these steps failing or being inappropriate, the individual concerned should write to, or contact the Director of Legal & Compliance..All staff members are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of TAS’s business or supply chains of any supplier tier at the earliest possible stage. If an individual believes or suspects a breach of this policy has occurred or that it may occur, they must notify their immediate manager or report it in accordance with the Whistleblowing Policy (LG038P) as soon as possible.  If an individual is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should raise it with their manager or the Director of Legal & ComplianceTAS aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. It is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its own business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an individual believes that they have suffered any such treatment, they should inform the Director of Legal & Compliance immediately. If the matter is not remedied, and the individual concerned is an employee, they should raise it formally using the Grievance Policy (S014P), which can be found on Connect or obtained from the HR team.**Communication and awareness of this policy**Training on this policy, and on the risk the TAS business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for it, and regular training will be provided as necessary.The commitment to addressing the issue of modern slavery in TAS business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter.**Breaches of this policy**Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.TAS may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy. |
| **5 Finance, Value for Money & Social Value**  | N/A |
| **6 Linked policies** | [Grievance Policy (S014P)](https://connect.abbeyfield.com/sorce/beacon/singlepageview.aspx?contentType=Documents&row=1048&SPVPrimaryMenu=5&SPVSecondaryMenu=2386&SPVReferrer=Find_documents&fromSearch=160727)[Safeguarding Adults Policy (LG031P)](https://connect.abbeyfield.com/sorce/beacon/singlepageview.aspx?contentType=Documents&row=1154&SPVPrimaryMenu=5&SPVSecondaryMenu=2386&SPVReferrer=Find_documents&fromSearch=160730)[Whistleblowing Policy (LG038P)](https://connect.abbeyfield.com/sorce/beacon/singlepageview.aspx?contentType=Documents&row=15676&SPVPrimaryMenu=5&SPVSecondaryMenu=2386&SPVReferrer=Find_documents&fromSearch=160737) |
| **7 Relevant Legislation / Regulation** | Modern Slavery Act 2015Public Interest Disclosure Act 1998 |
| **8 Guidance** | None.  |
| **9 Review** | Every 3 years, subject to any regulatory or legislative updates.  |
| **10 Procedure(s)** | None.  |
| **11 Statement** | [Anti-Slavery and Human Trafficking Statement](https://connect.abbeyfield.com/sorce/beacon/singlepageview.aspx?contentType=Documents&row=19034&SPVPrimaryMenu=5&SPVSecondaryMenu=2386&SPVReferrer=Legal_and_governance) |