



**Age UK Wandsworth**

**Modern Slavery Policy**

Ratified by Board: September 2024

Date for Review: September 2027

## **1. Introduction**

Age UK Wandsworth considers modern slavery and human trafficking extremely serious crimes, grave violations of human rights and contrary to the ethical standards and values that the organisation holds dear. As a charity that, as part of its wider objectives, fights for the protection and advancement of human rights in Wandsworth and beyond, Age UK Wandsworth has a zero-tolerance approach to such abuses.

Age UK Wandsworth's Board of Trustees and CEO are committed to preventing modern slavery in the organisation and to ensuring that the organisation's supply chain is as equally free of both modern slavery and human trafficking (within the reasonable bounds of Age UK Wandsworth's influence and control to ensure compliance with the Act by the supply chain and/or be assured of their compliance).

## **2. Scope**

The National Crime Agency defines Modern Slavery as:

"The recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after"

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.

Age UK Wandsworth acknowledges responsibility to comply with all principles of the Modern Slavery Act 2015 and will perform due diligence to provide transparency throughout the organisation. This policy applies to all persons working for the organisation or on its behalf in any capacity, including employees at all levels, trustees, volunteers, contractors, third-party representatives, and business partners.

## **3. Organisation and supply chain**

Age UK Wandsworth employs around 50 staff, and benefits from the support of approximately 300 volunteers. Age UK Wandsworth's staff are not of an employment status generally considered to be vulnerable to modern slavery in this country.

However, the organisation recognises that it cannot be complacent. Therefore, Age UK Wandsworth's main focus regarding modern slavery is ensuring that its supply chain both complies

with the Modern Slavery Act 2015, and the organisation's relevant policies and procedures and ethical standards.

The organisation is committed to improving practices to identify and eliminate modern slavery and human trafficking in its supply chains, and to act ethically and with integrity in all business relationships.

The organisation's supply chains comprise of around 90 suppliers and contractors. Age UK Wandsworth uses the products and services purchased from these suppliers to support the organisation's charitable activity and operations.

#### **4. Policy**

The prevention, detection and reporting of modern slavery in any part of the organisation or supply chain is the responsibility of all those working for the organisation or under its control.

Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Members of staff must notify their line manager or the CEO as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Members of staff are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of the organisation or the supply chains of any supplier at the earliest possible stage. If a staff member believes or suspects a breach of this policy has occurred or that it may occur, they must notify the CEO or report it in accordance with Age UK Wandsworth's Whistleblowing Policy as soon as possible. If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within the organisation's supply chain constitutes any of the various forms of modern slavery, they should raise it with their line manager or the CEO.

Age UK Wandsworth 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. The organisation 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 the organisation or in any part of the supply chain. If a member of staff believes that they have suffered any such treatment, they should inform their line manager immediately.

#### **5. Breaches of this Policy**

Age UK Wandsworth's CEO and Senior Leadership Team will take responsibility of implementing this policy and its objectives and will provide the necessary resources to ensure that its practices are effective in ensuring that modern day slavery is not taking place. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Age UK Wandsworth may also terminate its relationship with other individuals and organisations working on their behalf if they breach this policy.

## **6. Training**

Age UK Wandsworth has introduced mandatory training to improving staff awareness and understanding of modern slavery and human trafficking, which must be renewed annually. The e-learning course is provided by the UK Home Office and can be found here: [E-Learning First Responder Training - NPCC Modern Slavery & Organised Immigration Crime Programme \(npcc-msoicu.co.uk\)](https://npcc-msoicu.co.uk). Volunteers are also able to access this course.

## **7. Age UK Wandsworth's supply chain and due diligence**

The Age UK Wandsworth Finance team has oversight of the organisation's supply chain. The relevant policies are:

- Age UK Wandsworth's Financial Controls Policy and Procedure requires that suppliers are formally approved by Age UK Wandsworth's Finance team, such that they can only provide goods and services after confirming compliance with all applicable regulations and legislation, including the Act.
- Age UK Wandsworth's Whistleblowing Policy and Procedure asks staff to confidentially report concerns including modern slavery or human trafficking.
- Age UK Wandsworth's Safeguarding Policies and Procedures acknowledges modern slavery as a form of abuse and, where there is a concern about a child (under 18 years) or an adult (18 or over) who needs care and support, these Policies take effect.

### **Due Diligence**

Age UK Wandsworth aims to work with suppliers that demonstrate commitment to monitoring and reducing the risk of modern slavery and human trafficking taking place within their organisations or supply chains. We appreciate that many of our suppliers are, like us, small to medium sized organisations at the beginning of their commitment to raising awareness of modern slavery and with similarly limited back-office resources.

Moving forward, as a pre-condition to supplying Age UK Wandsworth, suppliers must have available information and if relevant, evidence of their compliance with the Modern Slavery Act. If a supplier fails to provide the information requested or meet Age UK Wandsworth's expectations, the organisation will take appropriate action, which may include not entering into a relationship or even terminating the relationship.