

Modern Slavery and Human Trafficking Policy

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Introduction

- 1.1 Modern slavery is a serious and organised crime that destroys communities and causes significant harm to victims. It is the illegal exploitation of people for personal or commercial gain, and involves people being coerced and forced into providing a service to others. It is a crime that affects people of all genders, ages (including children) and ethnicities and is a violation of fundamental human rights.
- 1.2 Some estimates suggest that there are approximately 40 million people living in slavery across the world, many of whom will be working to produce the goods and services which are bought and sold every day. The Home Office estimated that there were over 10 thousand potential victims in the UK alone in 2013.
- 1.3 Worldwide, the International Labour Organisation estimates hundreds of billions of illegal profits are generated by traffickers per year. Unscrupulous businesses who use slave labour undercut businesses and if this horrendous crime is to be eradicated from the UK and the rest of the world, government and businesses must work together.

Zero Tolerance

- 2.1 Veterans Relief and Support adopts zero tolerance to modern slavery and human trafficking, and all forms of corruption and bribery, directly and indirectly, associated with these criminal acts. While no such abuse is tolerated, an open and transparent approach is required by Veterans Relief and Support and our suppliers, to ensure we take steps to identify and tackle any instances of modern slavery in our supply chain.
- 2.2 Modern slavery is so pervasive that it is likely to exist in the supply chains of the goods and services purchased by third sector organisations. Veterans Relief and Support is committed to ensuring that the public's money and donations do not inadvertently fund this criminal activity and is committed to protecting vulnerable workers in its own supply chains from exploitation or harm.
- 2.3 Veterans Relief and Support fully supports the government's objectives to eradicate modern slavery and human trafficking.
- 2.4 Veterans Relief and Support believes that everyone has a right to be always treated with dignity and respect and under all circumstances. Veterans Relief and Support' Behaviour Code states that everyone working for Veterans Relief and Support, at Westminster or elsewhere, are responsible for ensuring Veterans Relief and Support meets the highest ethical standards of integrity, courtesy, and mutual respect.

Definitions

3.1 Modern slavery is the term used within the UK and is defined within the Modern Slavery Act 2015 (the 'Act'). The term is used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

3.2 Human trafficking is where a person arranges, or facilitates, the travel of another person with a view to that person being exploited.

Policy Aims

2.1 This policy provides a framework to ensure:

- All members of staff and volunteers at Veterans Relief and Support understand and are aware of their responsibilities in relation to modern slavery.
- The development of a strategic approach to identifying and tackling any modern slavery within Veterans Relief and Support' supply chains.
- The implementation of robust, transparent, and proportionate governance and assurance processes.
- Reporting of instances (or concerns) of modern slavery.

Responsibilities and Accountabilities

5.1 Veterans Relief and Support recognises that it is responsible for promoting ethical business practices and policies that protect all staff and volunteers from being abused or exploited.

5.2 The prevention, detection and reporting of modern slavery in any part of Veterans Relief and Support or its supply chain is the responsibility of all those working for us or on our behalf. Anyone within or representing Veterans Relief and Support must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.

5.3 Therefore, this policy applies to all persons working for Veterans Relief and Support or on behalf of Veterans Relief and Support, in any capacity, including employees at all levels, trustees, directors, officers, agency workers, seconded workers, volunteers, agents and contractors.

5.4 The Board of Trustees have overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under their control comply with it. They have the primary and day-to-day responsibility for implementing this policy,

monitoring its use and effectiveness, dealing with any related queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Partner Organisations Responsibilities

6.1 Veterans Relief and Support requires all partnering organisations with whom it is engaged to ensure that their goods, services, materials, and labour-related supply chains:

- Fully comply with the Act.
- Are clear, transparent, accountable, and auditable.
- Are free from ethical ambiguities.

6.2 Veterans Relief and Support expects that its partners operate to the highest level of ethical standards and will hold their own suppliers and other partnering organisations to the same high standards.

6.3 Veterans Relief and Support may require contractors who engage workers through a third party to obtain that third party's agreement to adhere to this policy and demonstrate how they seek to tackle any Modern Slavery within their supply chain.

6.4 Consistent with this approach, Veterans Relief and Support may require employment and recruitment agencies, and other third parties supplying workers to teams in either Administration, to demonstrate their compliance with this policy.

Awareness and Training

7.1 Veterans Relief and Support will raise awareness of this policy (and the Act) by notifying third parties in our frameworks, delivery partnerships and other organisations with which we regularly engage.

7.2 The policy will be published on Veterans Relief and Support website and copies will be available for all members of staff and volunteers.

7.3 Veterans Relief and Support will look for opportunities to raise awareness of modern slavery and human rights abuses throughout Veterans Relief and Support. Appropriate training and guidance will be provided, particularly for commercial and procurement staff.

7.4 Training will include how to identify the risks of modern slavery and ensure that suspected instances are handled correctly.

7.5 Veterans Relief and Support will provide modern slavery information, advice, and guidance to contractors. Where feasible, Veterans Relief and Support may also extend modern slavery training to contractors (however, contractors will retain their overall responsibility of providing training internally to their staff).

7.6 Veterans Relief and Support will maintain records of all members of Veterans Relief and Support who have completed modern slavery training.

Assurances and Transparency

8.1 Veterans Relief and Support has committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within either Administration or in any of Veterans Relief and Support' supply chains.

8.2 Veterans Relief and Support takes a risk-based approach to its procurement, contract management and supply chain management processes in relation to modern slavery and keeps them under continuous review.

8.3 As part of ongoing risk assessment and due diligence processes, Veterans Relief and Support will consider whether circumstances warrant the auditing of contractors to demonstrate their compliance with this policy.

8.4 To supplement this policy, Veterans Relief and Support will include an annual Transparency Statement within the Trustee Annual Report for each financial year, which will include details of any activities undertaken by Veterans Relief and Support and its supply chains to combat modern slavery.

8.5 Action in support of this policy will be regularly reported to the Board of Trustees.

Workplace Equality Network Support

9.1 Veterans Relief and Support will engage with the Workplace Equality Networks (WENs) to consider how workers in their supply chain may be more vulnerable to exploitation.

Non-Compliance, Reporting and Victim Support

10.1 If any member of Veterans Relief and Support is discovered to have breached this policy, then appropriate action will be taken.

10.2 If any contractor is found to have breached this policy, then appropriate action will be taken; this may range from considering the possibility of breaches being remediated, to terminating agreements.

10.3 Individuals who have reasonable suspicion or evidence of non-compliance with the Act in connection with any member of Veterans Relief and Support are encouraged to report their concerns to the Board of Trustees.

10.4 Alternatively, if any member of Veterans Relief and Support holds information that could lead to the identification, discovery, and recovery of victims of modern slavery or human trafficking in the UK:

- Contact the Modern Slavery Helpline on 080 0012 1700 (open 24 hours a day, 365 days a year)
- [Report it online to the Modern Slavery Helpline](#)

10.5 If you think you are a victim of modern slavery or human trafficking:

- Contact the Modern Slavery Helpline on 080 0012 1700 or [report it online](#)
- Contact the Victim Support Helpline on 080 8168 9111
- Visit the [Victim Support website](#)