

Modern Slavery Policy

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1 Definition of modern slavery

Modern slavery is a term which covers slavery (where 'ownership' is exercised over a person); servitude (which involves the obligation to provide services imposed by coercion); forced or compulsory labour (which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself voluntarily); and human trafficking (which concerns arranging or facilitating the travel of another with a view to exploiting them, even where the person consents to the travel).

We will ensure that we will comply with the Modern Slavery Act 2015 and are putting strict measures in place to ensure that modern slavery is not part of any of our business operations. This includes our supply chains, goods and services. This statement sets out the steps we are taking to continually develop our procedures and to check our compliance.

2 Overview

An overview of our organisational structure, key business activities and supply chains is as follows

Age UK Gloucestershire supports older people to age well, their way, through provision of information, advice and practical support. It is a network partner of Age UK. AUKG employs a team of advisors, volunteers, communications and back-office colleagues to deliver its activities. The team respond to enquiries and referrals.

AUKG obtains its funding from statutory and grant funders and generates income through sales of services and goods, including on eBay.

Key suppliers include outsourced IT (inc. telephony), HR, Finance and Health & Safety, procured having conducted due diligence.

We work closely with our main suppliers and clients and customers; with our employees and their representatives to ensure the highest level of compliance with the Charity Quality Standard (CQS), Age UK 'Quality Advice Standards' (QAS). We are regulated by the Charity Commission.

3 Responsibilities

- The Board of Trustees of Age UK Gloucestershire is responsible for overseeing our efforts to help to eliminate modern slavery and for

monitoring progress against the Key Performance Indicators (KPI's) contained in this document.

- The Leadership Team are responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements, and that any agencies used are appropriately checked and commit to ethical standards.
- Managers are responsible for upholding our “core values” and for ensuring that employees who work for them also behave in accordance with these.
- The Leadership Team is responsible for ensuring that prior to placing any orders with new suppliers they have a modern slavery policy, and that existing key suppliers are audited from time to time to ensure continued compliance.
- Our CEO and Leadership Team work with our contractors and funders to provide them with appropriate information on our modern slavery initiatives and to gain suggestions and feedback.
- Modern Slavery will be included in the focus of the Equity, Diversity, Inclusion and Belonging working group

4 Documentation

We have the following policies in place for employees:

- Ethical Fundraising Policy
- Code of conduct
- Grievance procedure
- Equal opportunity policy
- Recruitment and selection policy
- Whistleblowing policy

These are referenced in our employee handbook and copies are available on AUKG Team SharePoint site. All policies are updated at specified intervals, and we consult with managers prior to updating them.

- a. Employees are reminded of the policies from time and time and notified of any updates.

5 Risk assessments

We consider that the main areas of risk of modern slavery within our business and supply chain are as follows:

Risks linked to suppliers and procurement:

- 5.1.1 Companies providing items for resale, cleaning, facilities management, IT equipment, or local building contractors
- 5.1.2 Supplier staff who may be at risk of forced labour or debt bondage
- 5.1.3 Overseas manufactured goods (uniforms, equipment, marketing materials), where exploitation is harder to detect

Risks associated with volunteers and workforce:

- Volunteers who may be economically vulnerable
- Individuals who may not fully understand their rights, including temporary workers, migrants, or those with insecure housing
- Risk of exploitation through coercive control by third parties, even if not within the organisation

Risks emerging from Gloucestershire's local context:

- Older people and carers may encounter victims unknowingly
- Staff and volunteers may encounter potential victims during home visits, advice sessions or community outreach
- Vulnerable adults may be targeted by traffickers or criminal networks, including for forced labour, domestic servitude or financial exploitation
- Missed opportunities to identify victims because referrals have fallen locally despite national rises

Reputational and compliance risks:

- Expectations from donors, commissioners and partners for demonstrable ethical supply chain management
- Potential reputational harm if a supplier or partner is linked to exploitation
- Need for staff training to recognise indicators, given Gloucestershire's active anti-slavery partnerships

Risks linked to service commissioning and partner organisations:

- Third-party organisations not completing adequate due diligence
- Inconsistent safeguarding or reporting procedures across partners

- Complex subcontracting chains increasing the difficulty of detecting exploitation

6 Actions we are taking

We have taken the following actions as part of our drive to eliminate modern slavery:

- Included it as part of our EDIB working group
- Continue to review risks
- Introduce Modern Slavery training
- Develop a supplier's ethical code of conduct

6.1 Employees

- i. We have a recruitment and selection policy, and Equality and Diversity policy to assist compliance with equal opportunity.

Right to work checks are conducted prior to joining, and we check with all new recruits that they have not been required to pay any fees to gain work with us and inform them of the procedures that should be followed should they wish to leave our employment. In addition, we check that their passports have not been withheld and that they have not been required to sign any agreements with any third parties in respect of our offer of employment.

6.2 Agency workers

It would be unusual for AUKG to use agency workers. We would only use agency workers sparingly, where other options had been explored, for temporary placements and holiday/sickness cover.

- ii. We will ensure that any recruitment agencies we use have strict compliance to the Modern Slavery Act and require written confirmation from them that no agency worker is being exploited as part of any slavery or human trafficking. Recruitment agencies used will all be on our Preferred Supplier Listing.

6.3 Suppliers

We will check key suppliers have a Modern Slavery policy. Clients

We also work closely with our clients to ensure optimum environmental friendliness and to ensure that our practices and procedures are in line with national standards. This statement is brought to the attention of our customers via our website.

7 Due diligence, monitoring and auditing processes

All suppliers are issued with our Code of Conduct and are required to sign and return a commitment to ensuring that they take appropriate steps to ensure that their businesses and supply chains are free from modern slavery. prior to any orders being placed with them.

We confirm that all suppliers have a Modern Slavery policy and check this before commencing business.

8 Penalties for breach

- b. If a supplier is found to be involved in any form of modern slavery, its contract will be terminated either immediately or on its due renewal date, depending on the severity of the breach and we may also report any suspicions of criminal activity to the police.

If the breach is a minor one, we commit to discussing this with the supplier and understanding what actions they are taking to reassure our continued partnership or decision to terminate

- c. If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, he/she will be subject to our disciplinary procedure.

Training

- d. We will provide suitable training for all employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.

Employees and managers are informed of any updates to our policies. The Leadership and Management team (LMT) discuss and review policies in more detail to ensure awareness of risks and actions.

LMT will also undertake an e-learning module covering Modern Slavery.

9 Relevant performance indicators

The following key performance indicators will be used to assess our progress in the year to March 2027 towards eliminating modern slavery:

- all colleagues to be trained by 31 October 2026

- number of complaints raised through our grievance or whistleblowing procedures
- number of suppliers who are terminated due to allegations of modern slavery
- number of suppliers audited during the year to ensure they have a modern slavery policy

Signed by:

Name: Alan Inman-Ward

Office held: CEO

Date: 17/07/2026

Approved by the Board on 31/07/2026

Review every three years, next due July 2029