Policy 32: Anti-Modern Slavery

Last updated by: SH, RH, RS

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1. Introduction

a) Legislation has been introduced by the government to prevent exploitation through slavery, servitude and forced or compulsory labour and human trafficking, to provide for the protection of victims of such practices and to penalise perpetrators of such practices;

b) Age UK York, known, for the purposes of this Policy, as AUKY, acknowledges and works within this and all related legislation;

c) AUKY recognises that in its use of volunteers, who make a valued and essential contribution to its service provision, as well as to its staff, who are employed with individual contract terms of employment, it has a duty to ensure that the terms and requirements of the Modern Slavery Act, 2015 (the Act) are not contravened;

d) In addition, AUKY is often in contact with carers in the course of its various service provision activities and regards itself as also having a duty of care for the well-being of those carers with whom it is in contact.

2. Legislation

a) The Modern Slavery Act, 2015, defines slavery and human trafficking at sections 1, 2 and 4 of this Act;

b) S. 4 of the Asylum and Immigration (Treatment of Claimants Act), 2004 is also relevant;

c) Penalties are attached to contraventions of these Acts in accordance S. 5 of the Act.

3. Related policies

a) AUKY has created policies relating to:
   i) volunteers,
   ii) staff employment,
   iii) the various kinds of service provision and
   iv) purchasing and procurement, as follows:

   Policy  2 Sickness absence
   Policy 4 General leave
   Policy 7 Equipment ordering, purchasing and leasing
   Policy 20 Employment remuneration and pensions
   Policy 29 Harrassment and bullying
   Policy 31 Homeworking
   Policy 34 Involving older people
   Policy 35 Job sharing
   Policy 36 Lone workers
   Policy 45 Part-time working
   Policy 50 Recruitment and selection
   Policy 52 Redundancy
   Policy 58 Employee supervision and appraisal
   Policy 61 User involvement
   Policy 63 Volunteering
   Policy 65 Whistleblowing
   Policy 73 Day clubs and outings
   Policy 77 Safeguarding children
Policy 80 Trustees

2. The relevance of these policies to slavery and trafficking will be taken into account in the requirements of the Act and in training provision (see below).


a) Exploitation includes securing services or other activities of any kind from children and vulnerable people by any means including force or deception;

b) 'Vulnerable people' includes adults and children who are mentally or physically disabled or have a family relationship with a particular person;

c) 'Services or activities' is taken to mean purposes or situations where a person who is not a child, vulnerable adult or having a family relationship with a particular person would be likely to refuse to be used for such purposes or situations.

5. Responsibilities

a) S. 54 of the Modern Slavery Act, 2015, requires transparency in supply chains, so that an organisation such as AUKY must:

b) provide a statement on its website and in each annual report presented at its AGMs to the effect that it has taken steps to ensure that slavery and human trafficking is not taking place:

   i) in any of its supply chains, and
   ii) in any part of its own business;

c) indicate, via this statement, as appropriate:

   i) what are its business and supply chains;
   ii) its policies, due diligence, risk assessment and management of that risk and its performance indicators to measure the effectiveness of such risk management;
   iii) the training provided to its workers to guard against slavery and human trafficking.

d) All AUKY workers have a responsibility under this Act and in any instance of uncertainty must immediately refer to their own line manager or the Chief Officer;

e) Ultimate responsibility under this Act rests with the Board of Trustees of AUKY who have devolved day to day responsibility on the Chief Officer.

6. Safeguarding within Age UK York

a) AUKY undertakes the following:

   i) Employees will not be required to carry out any tasks or activities which are defined as exploitation in the Act (see above and AUKY Policies 2, 4, 20, 29, 31, 34, 35, 36, 45, 50, 52, 58, 65 and 73);

   ii) Volunteers will not be required to carry out any tasks or activities which are defined as exploitation in the Act (see AUKY Policies 29, 34, 63,65 and 73);

   iii) All other people with whom AUKY workers come into contact in the course of
their service provision activities will not be required to carry out any tasks or activities which are defined as exploitation in the Act;

iv) Where staff and volunteers are alerted to, or become aware of situations that fall within the definitions and requirements of the Act, they must, (s. 1(a) ) immediately inform their line manager or the Chief Officer;

b) In any circumstances set out in s. 1 (iv) above in this AUKY Policy it is likely that appropriate action must be taken even if the person thought to be being exploited resists any such action since the staff member or volunteer may be committing a criminal offence by failing to take action. In any such instance, the Trustees may decide to take legal advice.

7. Training

a) Training will be provided to all AUKY staff and workers and will include information on:

i) Their responsibilities under the Act;

ii) The terms of the Act itself. Copies of sections 1,2 and 4 of the Act will be made available at these training sessions;

iii) Discussion about human slavery and trafficking;

iv) Any other relevant topics raised at these training sessions.

8. Supply Chains

a) S. 54 of the Act requires transparency in supply chains and, generally speaking, statements regarding such transparency must appear on an organisation's website and in its Annual Report presented at each AGM;

b) Such statements will be provided by AUKY;

c) The government document 'Transparency in Supply Chains etc. A practical guide' will be used as guidance on each occasion when an item of equipment is considered for purchase or lease;

d) AUKY will produce a set of principles to follow. This set of principles will be used for risk assessment when considering purchase or lease of equipment;

e) In addition to the statement described in 8. a) AUKY may provide case study/ies of the type set out in the 'Transparency in Supply Chains etc. A practical guide' to demonstrate its pursuit of these principles.