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beyond expectations

COMP02 – Modern Slavery Policy

Review Date	Ratified Date	Next Planned Review
12/02/2025	14/03/2025	01/02/2026

Version Number	Date	Reason for Change	Owner
1.00	12/02/2025	New Policy	Lisa Hart

Area of the Charity	Indicate Policy Department
Whole charity	X
Arts and Crafts Centre	
Care	
Clinical	
College	
Compliance	
Data Protection and Privacy Notices	
Estates	
Finance	
Fundraising	
Health and Safety	
Human Resources	
IT	
Marketing	
Safeguarding	
Sight Loss Support	

Policy Owner: **Head of Compliance**

Review frequency: **Annual**

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1. Purpose

This policy sets out Henshaws' commitment to preventing modern slavery and human trafficking in all areas of our work and supply chains.

It addresses the legal and ethical responsibilities placed upon organisations under the **Modern Slavery Act 2015** and ensures that Henshaws maintains the highest standards of integrity, safeguarding, and social responsibility.

The policy is necessary to protect vulnerable individuals, uphold human rights, and ensure that our procurement and employment practices are ethical, transparent, and free from exploitation.

2. Scope

This policy applies to all employees, volunteers, trustees, governors, contractors, agency workers, consultants, and suppliers **engaged with Henshaws.**

It is relevant to all departments, including recruitment, HR, procurement, estates, and operational services, as well as any individuals or organisations acting on behalf of Henshaws.

3. Policy details

Henshaws has a zero-tolerance approach to all forms of modern slavery, including slavery, servitude, forced or compulsory labour, debt bondage, child labour, and human trafficking.

Our Commitments:

- We will act ethically and with integrity in all relationships.
- We will implement and enforce effective systems to prevent modern slavery in our organisation and supply chains.
- We will ensure all recruitment and employment practices comply with UK legislation, including right-to-work checks, fair pay, and equality standards.
- We will require suppliers and contractors to demonstrate compliance with the **Modern Slavery Act 2015** and reserve the right to terminate contracts where serious concerns are identified.
- We will conduct risk assessments on supply chains and contracts where higher risks of modern slavery may exist.
- All staff and volunteers are expected to remain vigilant and report any concerns immediately through Henshaws' safeguarding or whistleblowing procedures.

Legal Reference:

This policy is guided by and complies with the **Modern Slavery Act 2015 (UK)** and associated safeguarding legislation.

4. Training

All staff and volunteers will receive awareness training on modern slavery, including how to recognise signs of exploitation and how to report concerns.

Targeted training will be provided to staff with responsibilities for recruitment, safeguarding, and procurement.

Training will be mandatory and recorded as part of Henshaws' organisational development programme, with the Organisational Development team recognised as key stakeholders in the implementation of this policy.

5. Diversity, Equity and Inclusion (DEI) checklist

Question	Response
Name of policy	Modern Slavery Policy
Purpose of the Policy	To confirm Henshaws commitment to preventing modern slavery

What involvement and consultation has been done in relation to this policy? *(e.g. with relevant groups and stakeholders)*	CIPD Safeguarding Network DfE Gov.uk
Who is affected by the policy	All employees, volunteers, trustees, governors, agency workers, consultants and suppliers
What are the arrangements for monitoring and reviewing the actual impact of the policy	Ongoing reviews, safeguarding audits and referrals

Protected Characteristic Group	**Is there a potential for positive or negative impact?** Yes/No	**Please explain and give examples of any evidence/data used, for example** 'Applies to all staff with no advantage/disadvantage specific groups'
Disability	No	Applies to all staff with no advantage/disadvantage specific groups
Gender reassignment	No	Applies to all staff with no advantage/disadvantage specific groups
Marriage or civil partnership	No	Applies to all staff with no advantage/disadvantage specific groups
Pregnancy & Maternity	No	Applies to all staff with no advantage/disadvantage specific groups
Race	No	Applies to all staff with no advantage/disadvantage specific groups
Religion or belief	No	Applies to all staff with no advantage/disadvantage specific groups
Sexual orientation	No	Applies to all staff with no advantage/disadvantage specific groups
Sex (gender)	No	Applies to all staff with no advantage/disadvantage specific groups
Age	No	Applies to all staff with no advantage/disadvantage specific groups

Note: for any negative impact on a protected characteristic group, please adjust the policy to ensure this is not taking place

Question	**Explanation/Justification**
Is it possible the policy or change in policy could discriminate or unfairly disadvantage people?	No

Final Decision:	Mark the relevant box	Include any explanation / justification required
1. No barriers identified, therefore activity will proceed.	✔	
2. Henshaws will stop the policy or procedures if there is unfair treatment of any group		
3. Henshaws will adapt or change the policy in a way which will eliminate the bias		
4. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore Henshaws will **proceed with caution** with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.		

Name of Policy Owner who completed the DEI checklist	Title Policy Owner	Date completed
Lisa Hart	Modern Slavery Policy	12/02/2025