



Headway Suffolk

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Anti Modern slavery Policy

DEFINITIONS

Headway Suffolk considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

Headway Suffolk acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Headway Suffolk does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Headway Suffolk strictly adheres to the minimum

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standards required in relation to its responsibilities under the relevant employment legislation.

SUPPLY CHAINS:

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

POTENTIAL EXPOSURE

In general, the Charity considers its exposure to slavery/human trafficking to be nil. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING:

Headway Suffolk has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery. In accordance with section 54(4) of the Modern Slavery Act 2015, Headway Suffolk has taken the following steps to ensure that modern slavery is not taking place:

- We limit the geographical scope of our operations to the UK, Ireland and Europe - Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour
- With regards to national or international supply chains, our point of contact is preferably with a UK or Ireland company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have systems in place to encourage the reporting of concerns and the protection of whistle blowers
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MEASURES:

We use the following measures to check how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Right to work checks completed at recruitment stage;
- Ensure minimum employment age adhered to, in line with the relevant legislation
- Always apply national minimum wage thresholds, in line with the relevant legislation;
- Regular contact with material suppliers including their understanding of, and compliance with, our expectations.

CORPORATE SOCIAL RESPONSIBILITY:

Headway Suffolk operates a corporate social responsibility policy which incorporates its stance on modern slavery.

SLAVERY COMPLIANCE OFFICER

The CEO is the Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Charities obligations in this regard. This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

Responsibility
CEO Manager / Senior Person

To ensure that all staff and volunteers have seen and have access to this policy and procedure

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All staff and volunteers

To be aware of and adhere to this policy and procedure

Audit Plan

The CEO will monitor adherence of the policy and report findings to the Trustees. The CEO and Board will also review the policy and update the policy as annually or sooner if necessary

Scope

This policy and procedure is to be applied within all Headway Services.

Headway Staff/ volunteer training

This policy should be presented to staff and volunteers at the commencement of their employment. It should be signed by them to indicate that they agree to abide by it and should be retained on their personal file.

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