

Modern Slavery Policy & Procedures

**Lead Director**

Steve Harris – Finance Director

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Lead Author

Jane Taylor – Head of Procurement & Contract Management

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1. Introduction and Purpose of Policy

The Modern Slavery Act 2015 is an Act of Parliament of the United Kingdom. It is designed to combat modern slavery in the UK and consolidates previous offences relating to trafficking and slavery. The act extends to England and Wales.

Modern slavery can occur in all forms including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Children's Trust is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, consistent with the Modern Slavery Act 2015. As part of our contracting processes where possible we will include specific prohibitions against the use of forced, compulsory or trafficked labour, use of sweatshops, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. Scope

This policy applies to all staff and volunteers working within The Children's Trust

3. Roles & Responsibilities

This policy applies not only to third party and business partner engagement but to all persons working for us or on our behalf, in any capacity including employees*, directors, officers, agency workers, volunteers, agents, contractors and suppliers.

**This policy does not form part of any employee's contract of employment and we may amend this it at any time. However, they still need to comply with the policy.*

The SLT has overall responsibility for ensuring that this policy is followed and ensure that everyone who is either employed directly or indirectly including third parties we may engage with, complies accordingly. The SLT, in conjunction with the Procurement Team (working with suppliers), has primary and day-to-day responsibility for implementing this policy, ensuring its use and effectiveness, dealing with any queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

4. Compliance

We expect high standards from all of our contractors, suppliers and other business partners and we are in the process of including a contractual term in our agreements with significant suppliers wherever possible.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is primarily the responsibility of the SLT.

However, management at all levels are responsible for ensuring those reporting to them who work with us or are under our control understand and comply with this policy and are given any required training where required.

When engaging with a supplier, The Children's Trust, as part of its contractual process, would expect the third party to be able to provide its own Modern Slavery policy and how it is set out and applied to their working practices and third-party suppliers.

Where applicable, compliance with this policy will be spelt out in any contractual terms when engaging on new business with The Children's Trust. From 2025/2026 this will be a mandatory requirement for engagements exceeding £10,000 per annum as part of the onboarding process and will be recorded, for those companies that fall into the threshold where this policy applies or is required as best practice. It is expected that this policy is followed for all engagements as best practice.

Since all managers are responsible for the staff they employ and utilise, along with the suppliers they contract, the Finance team will commit to providing training on the Modern Slavery Act on an annual basis to the SLT and other managers who work with the higher-risk areas.

5. Auditing

The Charity sector is deemed a relatively low risk sector with limited ability to influence supply chains. However we will commit to reviewing the top 5% of suppliers in the high-risk areas (agency staff, construction, medical supplies etc) for their adherence to the Modern Slavery Act in their dealings with The Children's Trust.

The Contracting & Procurement process continues to be developed, to ensure that we meet our obligations in respect of the Modern Slavery Act 2015 requirements.

6. Breaches

The Children's Trust encourages anyone to raise any concerns if they have a worry about modern slavery in any part of our business or the supply chains of any supplier we engage with, at the earliest possible stage.

Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. The individual must notify their manager and/or the Procurement Department as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. This applies even if there is uncertainty whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery. Anyone who makes a qualifying disclosure in accordance with our Whistleblowing Policy will not be penalised or suffer adverse treatment for raising the concern.

7. Resolutions

If an issue is identified with a supplier either directly or through their supply chain, Procurement will work with them to prepare a corrective action plan and work to resolve within an agreed time period.

We reserve the right to terminate our relationship with individuals or organisations in our supply chain if there is a breach of this policy.

8. Review

Following the initial adoption, this Modern Slavery Policy may be reviewed by SLT as and when required and may be amended from time to time.

9. Document Change Control

Version	Status	Description (of changes)	Reviewed by	Reviewed/ Issued Date
1.0	Draft	Updating of Modern Slavery Policy	Jane Taylor	25 August 2025
1.3	Draft	Review of content	Steve Harris	22 September 2025
1.0	Final	Approved	TBC	TBC

APPENDIX 1 – STAKEHOLDER ENGAGEMENT CHECKLIST

Review and complete the following checklist to indicate which stakeholders were consulted in the development of this policy.

#	Question	Yes/ No	Stakeholder(s) to be consulted
1	Is there a statutory requirement to have in place this particular policy. Does the policy need to comply with detailed legislation?	Yes However based on threshold this is in place with TCT as best practice	Finance Director
2	Is implementation of the policy (or any element of it) dependent on the use of new or existing information technology?	No	Head of IT
3	Does implementation of the policy (or any element of it) place any demands on/ or affect the activities of the Estates and Facilities teams (e.g. does it impact the provision or maintenance of premises, equipment, vehicles or other TCT assets)?	Yes	Head of Estates a part of Procurement process
4	Does implementation of the policy or any element of it involve/ impact the processing of personal data?	No	Data Protection Officer
5	Does implementation of the policy require significant unbudgeted operational or capital expenditure?	No	Finance Director
6	Does implementation of the policy (or any element of it) directly or indirectly impact on the delivery of services / activities in other areas of the organisation? E.g. a policy written by a clinical lead in CF&S might impact on the delivery of care for CYP attending the school.	No	Relevant, impacted OLT members

7	Is there a need to consider Health and Safety or potential environmental impacts in developing and implementing the policy?	No	Health and Safety Manager
8	Have you consulted with a representative of those who will be directly impacted by the policy?	n/a	
9	Is there a need to consider Equity, Diversity and Inclusion in developing and implementing the policy?	No	EDI Lead
10	Is there a need to consider sustainability and potential environmental impacts in developing and implementing the policy?	No	Lead for Responsible Organisation
11	Please detail any other stakeholder groups consulted, if applicable.		

APPENDIX 2 – OBLIGATIONS UNDER THE MODERN SLAVERY ACT 2015 (MSA)

Any organisation that engages in commercial activities in the UK (it should be noted that the purpose of profits does not matter here so this can include large charities, public bodies or educational institutions as well as corporate bodies or partnerships) could be caught by the MSA. Organisations with the following characteristics will be required to produce a transparency statement:

- the organisation carries out business in the UK and supplies goods or services. Guidance suggests that the organisation must have a 'demonstrable business presence' in the UK in order to be caught by the MSA
- the organisation has an aggregate global turnover of not less than £36 million.

Organisations are afforded a certain amount of discretion in the preparation and content of the statement and the MSA does not prescribe what the statement must include. However, it requires that the statement must give details of steps the organisation has taken during the financial year to ensure that there is no slavery or trafficking activity within the business or its supply chains and provides a list of recommended issues to be covered within their statement:

- its policies in relation to slavery and human trafficking
- its due diligence processes in relation to slavery and human trafficking in its business and supply chains
- the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk
- its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate
- the training about slavery and human trafficking available to its staff
- the organisation's structure

The MSA requires that the statement is approved by the board of directors of a company and signed by a director (or the equivalent approval requirements in the case of other organisations).

There are currently no penalties imposed for non-compliance with the reporting requirements under the MSA. The secretary of state may enforce the duty to prepare a statement in civil proceedings by way of injunction but aside from this, the key consequence of failure to comply with these requirements is the potential damage to the organisation's reputation and brand.

Companies will also want to bear in mind that they can include warranties and undertakings for compliance with the MSA, and with the company's anti-slavery and human trafficking policy, within the company's supply agreements and companies should look to ensure that appropriate contractual provisions are included in supply agreements to cover compliance by suppliers and sub-contractors.

APPENDIX 3 SAMPLE TEMPLATE CLAUSE – COMPLIANCE WITH LAWS AND POLICIES IN RELATION TO THE MODERN SLAVERY ACT (MSA)

1.1 In performing its obligations under the agreement, the Supplier shall, and shall ensure that each of its subcontractors shall, where applicable:

- (a) comply with all applicable laws, statutes, regulations in force from time to time including but not limited to the Modern Slavery Act 2015;
- (b) take reasonable steps to ensure that there is no modern slavery or human trafficking in the Suppliers or subcontractors supply chains or in any part of their business

1.2 The Supplier represents and warrants that:

neither the Supplier nor any of its officers, employees or other persons associated with it has:

- (i) been convicted of any offence involving slavery and human trafficking; and
- (ii) having made reasonable enquiries, to the best of its knowledge, has been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.

1.3 The Supplier shall implement due diligence procedures for its own suppliers, subcontractors and other participants to ensure that there is no slavery or human trafficking in its supply chains including the use of sweatshops.

1.4 The Supplier shall provide its own Modern Slavery policy and details of how it is applied to working practices and third party suppliers.

1.5 Any identified risks with the Supplier either directly or through its subcontractors shall be raised as an issue and a corrective plan put in place within an acceptable period to resolve to be agreed by both parties.

1.6 A breach of this clause may invoke the term.