

GLOUCESTER CHARITIES TRUST Core Policy on	GCT	
	Modern Slavery	V2.0 Feb 21
<i>(review history on the final page of this policy)</i>	Reviewed on/by:	24/02/21/BL
	Next due for Review:	24/02/23
Indicate whether policy wholly a GCT original or an adapted W&P policy:		W&P

“At Gloucester Charities Trust, we recognise and understand our responsibilities for ethical working practices. The Trust is committed to these ethical practices in preventing slavery and human trafficking in our activities and in our supply chain. The Trust will check on an annual basis, that all suppliers of goods and services to the Trust have committed to such practices where the law requires such businesses to have made their commitment available to the public.”

Policy Statement

Modern Slavery is a crime which results in an abhorrent abuse of human rights. The Modern Slavery Act 2015 referred to as the “Act” created offences of slavery, servitude and financial or compulsory labour.

Definitions of Modern Slavery

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ownership of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he or she did own the person, which deprives the victim of their freedom.

Servitude in the obligation to provide services that is imposed using coercion and includes the obligation of a “Serf” to live on another person’s property and the impossibility of changing his or her condition.

Forced or Compulsory Labour

This is defined in international labour law by the International Labour Organisations (ILO) Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view of exploiting them for sexual exploitation or non- sexual exploitation.

Child Labour

This is defined by the ILO as children under 12 years working in any economic activity, those aged 12-14 engaged in more than light work and all children engaged in the worst forms of child labour. This policy is for adult providers only.

Compliance Requirements

The transparency in supply chains provision within the Act seeks to address the role of businesses, across all sectors preventing Modern Slavery in their supply chains and organisations. The following guidance sets out how businesses can meet these requirements, as set out in the Act.

There is a requirement that any commercial organisation, in any sector, which supplies goods and services, and carries on a business, or part of a business, in the UK and is above a specified total turnover, must produce a slavery and human trafficking statement for each financial year of the organisation. Regulations have set the total turnover threshold at £36Million.

The Trust is below this threshold and there is no requirement for us to produce a statement, but organisations are encouraged to voluntarily produce a slavery and human trafficking statement, especially where they are contracting with organisations above the threshold.

The Policy

Taking the above into account, the Trust has produced a statement which appears at the top of this policy and which will be available on the Trusts website including a link to this policy.

The Trust will endeavour to check the Modern Slavery statements of its suppliers so that it can assure itself of their commitment to the requirements of the Modern Slavery Act 2015 - records of which will be made available on request.

All managers will look at the Modern Slavery commitment of any new supplier before engaging with them. If the statement of commitment is not available publicly from a supplier, ask for it.

In both above cases, if no statement is available and the business is not required to produce one as they are under the £36million threshold, a note should be made on the supplier list but this in of itself would not preclude the trust from engaging in the purchasing of goods and services from the supplier. Where a supplier does exceed the threshold, the Trust would have to consider removing its patronage.

Reporting

When staff believe there is a possibility of a Modern Slavery situation, they must in the first instance report it to their manager who will then take it forward by reporting it to the helpline 08000 121700 or report it online on the Modern Slavery helpline website.

Related Guidance

- [Gov. UK https://www.gov.uk/government/collections/modern-slavery](https://www.gov.uk/government/collections/modern-slavery)
- Transparency in supply chains etc – a practical guide
[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency in Supply Chains A Practical Guide 2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf)
- Modern Slavery helpline website <https://www.modernslaveryhelpline.org/report>
- Gov. UK A call to action to end forced labour, modern slavery and human trafficking
<https://www.gov.uk/government/publications/a-call-to-action-to-end-forced-labour-modern-slavery-and-human-trafficking>

Training Statement

As part of our Induction process staff will be issued with a A4 page poster from the Modern Slavery Helpline and will have access to the Modern Slavery Helpline Guide. We also train our managers to ensure they understand their responsibilities and are carrying them out. Information and help can be accessed on the phone number and website above.

REVIEW

This policy will be reviewed by the CEO or delegated to a member of the Trust's Senior Management Team whose role is the most closely linked to the subject of this document.

Signed: **Barry Leach**

Date: **24/02/2021**

Review History
V1.0 – BL 01/12/19: new policy.
V2.0 – BL 24/02/21: change to training info and creation of short statement for publication.