

# Anti-Slavery & Human Trafficking Policy

Modern slavery is a crime and a violation of fundamental human rights. Modern Slavery is a broad term used to encompass slavery, servitude and forced or compulsory labour and human trafficking. It includes slavery-like practices such as debt bondage, sale or exploitation of children and forced servile marriage. The underlying theme of all of these offences is one person depriving another person of their liberty, in order to exploit them for personal or commercial gain. Victims of modern slavery and people trafficking can also be victims of threats, punishment or violent behaviour in order to force them to work. Trafficking involves transporting, recruiting or harbouring people for the purpose of exploitation via various means of coercion from one country to another.

Macc is committed to acting ethically and with integrity in all our services and relationships. We are continuously improving our practices to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships. As part of this process, we will undertake a review of our supply chain to identify and assess potential risk areas and maintain a register detailing the same.

Macc expects high standards from all of our subcontractors, suppliers and other business partners and have made this an expectation in our agreements with significant suppliers wherever possible. We will conduct regular surveys of all our suppliers to ask whether they have Anti-Slavery and Human Trafficking Policies, and whether staff are encouraged to use the whistleblowing procedure to report breaches of the Modern Slavery Act 2015.

This policy applies to everyone working for Macc or on Macc's behalf in any capacity, including employees at all levels, Trustees, volunteers, agency workers, seconded workers, interns, apprentices, agents, contractors, external consultants, third-party representatives and business partners. The policy will be included in induction programmes for the above.

## **Responsibility for the policy**

Macc's Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, day-to-day responsibility for ensuring it is implemented and complied with throughout the organisation is the responsibility of the Chief Executive and the Management Team.

## **What to do if you are concerned about an issue of modern slavery or trafficking**

The prevention, detection and reporting of modern slavery in any part of Macc's activities or supply chains is the responsibility of all those working for Macc or under Macc's control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you have any concern about a modern slavery or human trafficking issue, you must report it, either directly to a Macc manager (verbally or in writing), or using Macc's Whistleblowing procedure. If you are in any doubt about whether a particular act or working conditions in any of

Macc's business or VCSE relationships may contravene any aspect of this policy then err on the side of caution.

It will then be the responsibility of the Management team to respond in line with our Safeguarding policies and procedures, deciding what action to take and reporting the issue to the relevant authorities. Records of decisions and actions take will be kept, as set out in the policy.

We encourage openness and will support anyone who raises genuine concerns in good faith in accordance with the firm's whistleblowing policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their knowledge, or suspicion, that modern slavery is taking place in any part of our business or in any of our supply chains.

### **Communication and awareness of this policy**

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. This policy is made available via Macc's website, and reviewed regularly by the trustee board to ensure it is kept up to date and relevant. We will also encourage other VCSE organisations with which they work to review their supplies chains and other practices, and adopt similar policies where relevant.

Macc will also take part in consultations and campaigns to raise awareness of the issues of modern slavery and trafficking and will support other VCSE organisations in their work on this topic.

### **Further information**

Further information about modern slavery and trafficking can be found in the Macc's additional Safeguarding Guidance, which is stored in the policies folder on the shared drive, or available from a manager on request.

Macc will also provide ongoing training, both internally and as part of its VCSE training programme, and ensure issues around modern slavery and trafficking are included in our equalities action plan.

### **Breaches of this policy**

Any employee who breaches this policy could face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

