

Empowering Futures

Registered Charity Number (CIC) 1182139

Tel: 07743 57 57 87

Email: admin@empoweringfutures.co.uk

Website: www.empoweringfutures.co.uk

Address: Stables, No 2 Bury Hill, Moorend, Winterbourne, Bristol BS16 1SS



Empowering Futures Anti-Modern-Day Slavery Policy

Anti-Slavery Statement

Here at Empowering Futures, we make a clear statement that we take our responsibilities to our volunteers, people working within our charity, and our co-workers seriously; this is included within this policy, induction and reviewed each year.

As a Charity, we work with vulnerable people daily. This policy is shared on our website, in our staff and volunteers handbook, covered in training which is during induction and mentioned during performance reviews. Prior to commencing engagement on the farm, inductions are held for all staff, volunteers and participants to ensure this policy is understood and achievable. We have ensured this policy is accessible to all by providing easy-read information with clear, easy-read, basic instructions and pictures to help educate and deliver the message.

Purpose of Policy

This policy is designed to educate and outline the procedures which we follow to ensure nobody is at risk of slavery. The policy and the training we deliver to all stakeholders are to ensure we all are vigilant and aware of our commitment and responsibilities.

What Is Slavery?

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any voluntarily penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

This policy covers all four activities.

How Is It Relevant to Us?

- Modern slavery is a complex and multi-faceted crime and tackling it requires many organisations and individuals to play a part. At first glance, individuals may think this subject is irrelevant to us, but it's not.

We follow the Social Model of Disability. We offer bespoke opportunities to ensure we remain person centred. Our services are firmly embedded with quality and purpose for each individual we work with. Our approach is holistic. We encourage personal responsibility. We aim to increase independence and to empower individuals. We have a proven track record of significant success.

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- At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.
- The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.
- With this in mind, we need to pay particularly close attention to our supply chain, especially those areas which have historically proven to be at risk of the activities in Clause 1:
 - Outsourced activities such as cleaning, waste management, etc.
 - Short term hire of low skilled labour
 - Sourcing of raw materials from certain locations in the world.

Responsibilities

Our Charity and those we work with, have responsibilities to ensure our volunteers and co-workers are safeguarded, treated fairly and with dignity.

Everyone must observe this Policy and be aware that 'turning a blind eye' is unacceptable and simply not an option.

Empowering Futures

We will:

- (a) Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- (b) Be clear about our recruitment policy
- (c) Examine our suppliers and be clear with key suppliers our expectations regarding the Act
- (d) Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- (e) Ensure we have in place an open and transparent grievance process for all staff
- (f) Seek to raise awareness so that those we work with know what we are doing to promote their welfare

Make a clear statement that we take our responsibilities to our volunteers and our co workers seriously (see Anti-slavery statement)

Managers

Managers will:

- (a) Listen and be approachable to colleagues
- (b) Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
- (c) Remain alert to indicators of slavery (see 6.0 Identifying slavery)
- (d) Raise the awareness and ensure all employees are provided a copy of this policy and be aware of their responsibilities

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(e) Use their experience and professional judgement to gauge situations

Co Workers

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

Keep your eyes and ears open—if you suspect someone is being controlled or forced by someone else to work or provide services, follow our reporting procedure

The Risks

The principal areas of risk we face, related to slavery and human trafficking, include Recruitment either through agencies or direct.

We manage these risk areas through the procedures set out in this policy.

- Follow our reporting procedure if a colleague says something you think might indicate they are being exploited.
- Tell us if you think there is more we can do to prevent people from being exploited

Our Procedures

Recruitment

Using Agencies

Currently, as of this policy date, Empowering Futures does not use staffing agencies; however, should we require the need to use an agency within the year of the policy, then the following procedures will apply;

(a) The Charity follows a firm policy and will only use agreed specified reputable recruitment agencies.

(b) We expect all recruitment agencies with whom we engage:

- To fully comply with the Modern Anti-Slavery Act 2015;
- Are free from ethical ambiguities;
- Are transparent, accountable and auditable.

(c) If the Charity has reason to believe that any recruitment agency

(d) has failed to meet these standards, the manager should be informed and any contracts will be terminated.

(e) We will keep agents on the list under regular reviews, should we need to recruit via an

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agency.

General Recruitment

Further details can be found in our recruitment and employment policies, however, for the purpose of this policy, we have outlined the key procedures which relate to this policy.

In the event that the charity (Empowering Futures) employs a new member of staff

- (a) We always ensure all staff have a written contract of employment.
- (b) We always ensure staff are legally able to work in the UK.
- (c) We provide information to all new recruits on their statutory rights, including sick pay, holiday pay and any other benefits they may be entitled to.

If when we employ somebody new, we suspect someone is being exploited, the manager will follow the written reporting procedures.

Identifying Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it to the site manager who will follow our reporting procedures.

Reporting Slavery

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- Talking to someone about your concerns may stop someone else from being exploited or abused
- If you think that someone is in immediate danger, dial 999.
- Otherwise, you should discuss your concerns with the manager on site, who will decide a course of action which may include contacting the Police or the Gangmasters Licensing Association (GLA).
- Not all victims may want to be helped, and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of immediate danger, you discuss your concerns first with the Manager on site before taking any further action.

Training

We ensure that all employees are made aware of this policy and their obligation to comply with this policy.

Monitoring Our Procedures

We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.

Date of Policy Creation: 1st February 2019

Last Reviewed: 19/04/2023

Next Review Due: 19/04/2024

Signed off by: Maria Needs

Signature Sign-Off:

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