

# Anti-Slavery and Human Trafficking

## Policy and Procedure

Policy Reference: <b>HR 3.46</b>		
Issue Date: <b>September 2018</b>	Last Reviewed: <b>September 2018</b>	Responsible: <b>Director of Medical and People Services Development</b>

### 1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, forced servitude, forced and 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.
- 1.2 We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our dealings and relationships. We will implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in Epilepsy Society or within any third parties (agencies) that we are associated with.
- 1.3 We are also committed to ensuring there is transparency in our organisation and in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.
- 1.4 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, bank workers, agency workers, those on honorary contracts and volunteers.
- 1.5 This policy does not form part of any employee's contract of employment and may be amended at any time.

### 2. RESPONSIBILITY FOR THE POLICY

- 2.1 The Management Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations.
- 2.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy

### **3. COMPLIANCE WITH THE POLICY**

- 3.1 All those working for or on behalf of Epilepsy Society must ensure that they read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our organisation is the responsibility of all those working for us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible. The matter will then be referred on to HR and be dealt with in conjunction with the necessary agencies or third parties.
- 3.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this 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 suspicion that modern slavery of whatever form is or may be taking place in any part of Epilepsy Society.

### **4. RECRUITMENT**

- 4.1 We use only specified, reputable employment agencies/consultants to source candidates and we carry out periodic checks of their policies and procedures.
- 4.2 Through our own robust pre-employment checking process, Epilepsy Society ensures that all potential employees have the legal right to work in the UK and that relevant employment legislation is adhered to.

### **5. SUPPLIERS AND THIRD PARTIES**

- 5.1 The Epilepsy Society will undertake due diligence when considering using new suppliers, and will regularly review its existing suppliers. Where possible, we build long standing relationships with suppliers and make clear our expectations of business behaviour.
- 5.2 Our procurement processes will seek assurances that potential providers have and implement appropriate Anti Slavery policies.

## **6. BREACHES OF THIS POLICY**

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

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

## **REFERENCES**

This policy should be read in conjunction with:

- Whistleblowing policy