

Modern Slavery Policy



Status:	Final
Date status agreed by DMT:	31/12/18
Date status agreed by Board of Trustees:	15/11/18
Policy Champion:	DMT
Next Review Date	31/12/21
Issue Number:	Number 3
Other relevant Procedure(s):	
Policy Champion (who may be contacted for help and advice on this policy): Director Management Team Tel: 02920 236216 Email: DMT@mirus-wales.org.uk	
<i>Amendments to the policy are detailed on the Policy Information/Amendment Tracking Form at the end of the Document.</i>	

1. Policy statement

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, 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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our organisation or in any of our supply chains.

1.2 **mirus** is committed to ensuring there is transparency in our organisation and in our approach to tackling modern slavery throughout our supply chains, 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, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, trustees, agency workers, volunteers, interns, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the policy

2.1 The Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Chief Executive has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Line managers at all levels are responsible for ensuring those reporting to them

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understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Chief Executive.

3. Compliance with the policy

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for us or under our control. 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 in any parts of our business or supply chains of any supplier tier 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.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Head of Procurement.

3.7 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager or alternatively a member of the Senior Management Team immediately. If the matter is

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not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

4. Communication and awareness of this policy

4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

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

4.3 The Board of Trustees will review our Modern Slavery and human trafficking statement on an annual basis and this will be published on our internet (see Appendix 1).

5. Breaches of this policy

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

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

6. Track Changes

Date of Review	Name of Reviewer	Reviewer's comments & recommended changes	Changes Agreed (Date)	Document updated (Date)
02/11/18	DMT	New Policy	2/11/18	02/11/18
12/12/19	DMT	Minor Changes		13/12/19
12/12/20	DMT	Minor Changes		13/12/20

Modern Slavery aAnd Human Trafficking Statement

Mirus-Wales is committed to preventing modern slavery in its activities and supply chains.

Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude.

This statement sets out the activities that have taken place to date to ensure that there is no slavery or human trafficking in **mirus** and its supply chains.

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Our Organisation

We provide outcomes-focussed services for people with a learning disability, a mental or physical illness of any description, old age, dependence on drugs or alcohol, homelessness, financial hardship, or any other vulnerability or disadvantage, in order to enable them to live fulfilled, valued lives, by (in particular but not exclusively):

- providing care, support, education, accommodation, and practical advice;
- supporting people through rehabilitation and re-enablement;
- supporting the carers who are helping such persons within and outside the home; and providing training and advisory services for organisations and individuals undertaking activities that further charitable purposes falling within the Objects of the Charity.

Policies

We have the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

1. Whistleblowing policy
mirus encourages all its employees and stakeholders to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for anyone to make disclosures, without fear of retaliation.
2. Complaints Policy
Employees, people we support and their families or others who have concerns can also use our confidential helpline or complete our confidential disclosure form.
3. Employee handbook
mirus makes clear to employees the actions, values and behaviour expected

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of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

- 4. Recruitment policy
We operate a robust recruitment policy, including conducting UK eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- 5. Due Diligence
HR Officers and Managers undergo specific investigation training and are responsible for carrying out any investigations and due diligence in relation to known or suspected instances of modern slavery or human trafficking.
- 6. Our supply chain
The organisation takes the following steps to ensure our supply chain have taken steps to prevent modern slavery and human trafficking within their business: We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.

- 7. Risk
~~mirus has in place systems and processes for actively managing the organisations risks. mirus-st of all organisational risks which are regularly reviewed, monitored and assessed.~~
 - ~~The Board describes the approach to risk in its annual report in line with regulatory requirements each year.~~
- 7. ~~The Board of Trustees regularly reviews and discusses specific significant risks and the cumulative effect of these risks making plans to mitigate and manage these risks appropriately controls risk through its Governance Committee and Risk Register. Its aim is to safeguard the assets of the company; ensure compliance with all statutory and regulatory requirements and maximise the chances of achieving the corporate objectives.~~

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Actions for the next financial year12 months

A full review of our Supply Chain

We continue to engage with our 3rd party suppliers to validate their processes and policies and ensure they fully understand our expectations of them.

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We will continue to provide information and training for our staff as appropriate so that they understand the legislation and potential impact on our activities.

We have been a supporter of the #Pay Them Fairly Campaigns during the last 12 months and will continue to work with the campaign going forward to ensure that the

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~~pledges made are delivered in future governments.~~

~~• Develop and distribute a questionnaire to our current supply chain that ensures as far as possible that we have fully reviewed and taken steps to ensure that Modern Salary nor human trafficking is not within our supply chain at any level.~~

• Use the same questionnaire to approve any new suppliers

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Board approval

This statement has been approved by the Mirus-Wales Board, who will review and update it annually.