



Bridging the Gap (Manchester)

Modern Slavery and Human Trafficking Statement

Registered Charity Number: 1170952

This policy and guidance will be reviewed annually or in line with any legislative changes and guidance. This will ensure that this document is current and fit for purpose.

This policy should be read in conjunction with: -

- **Whistleblowing Policy**
- **Safeguarding Policy**
- **Equality, Diversity and Inclusion Policy**
- **Codes of Conduct**
- **Supplier Code of Conduct**

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1. Definitions:

- **Modern slavery:** Anti-Slavery International, defines modern slavery as *“when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom.”* This includes, but is not limited to, human trafficking, forced labour and debt bondage. Modern slavery is all around us, often hidden in plain sight. People can become enslaved making our clothes, serving our food, picking our crops, working in factories, or working in houses as cooks, cleaners or childrens’ nannies.
- **Forced labour.** Any work or services people are forced to do against their will, usually under threat of punishment to instil fear and compliance.
- **Debt bondage/bonded labour.** People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.
- **Domestic servitude.** Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person’s home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.
- **Human trafficking:** The essence of human trafficking is that the victim is coerced or deceived into a situation where they are exploited. Article 4(a) of the Council of Europe Convention on Action against Trafficking in Human Beings (the Convention) defines ‘human trafficking’ as:

“the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.”

Human trafficking consists of 3 basic components: -

Action - recruitment, transportation, transfer, harbouring or receipt, which includes an element of movement whether national or cross-border; which is achieved by a.....

Means - for example a threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability; for the **purpose** of.....

Exploitation - for example, sexual exploitation, forced labour or domestic servitude, slavery, financial exploitation, removal of organs

2. Introduction

Modern slavery is a serious crime that violates human rights. Victims are forced, threatened or deceived into situations of subjugation, degradation and control which undermine their personal identity and sense of self.

Modern slavery is a real problem for millions of people around the world, including many in developed countries. It can take many forms including trafficking of people, forced labour and servitude. Victims are often hidden away, may be unable to leave their situation, or may not come forward because of fear or shame. Every organisation is at risk of being involved in this type of crime through its own operations and its supply chains.

BTG is committed to the highest standards of integrity and social responsibility, and expects all of its Suppliers ("Suppliers") engaged in providing products and services to BTG to have, or to make, a similar commitment.

3. Scope

BTG has a zero-tolerance approach to modern slavery and is fully committed to prevent slavery and human trafficking in its operations and supply chain. This policy sets out the actions BTG has taken to understand all potential modern slavery risks related to its business.

4. Business and Supply Chains

BTG operates its business in the UK however, we are aware that our suppliers may use supply chains which operate outside of the UK.

BTG establishes a relationship of trust and integrity with all its suppliers, which is built upon mutually beneficial factors. BTG's supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance, health, safety and environmental standards.

BTG confirms that it has not been made aware of any allegations of modern slavery or human trafficking within its own supply chain, but if it were, then we would act immediately against the supplier and report the matter to the appropriate authorities.

5. Assessing the risks

In the past year BTG has expanded and developed its services, which has led to an increased supply chain. Whilst BTG only carries out its business within the UK, we acknowledge that our suppliers or their supply chain may contract services from outside of the UK. In order to ensure our suppliers are compliant and adhere to the law and best practice BTG conducts supplier checks to understand the risks involved. This assessment will determine BTG's response and the risk controls it then implements.

5.1 Supplier due diligence

BTG conducts due diligence on all new suppliers during on-boarding and on existing suppliers at periodic intervals to ensure on-going compliance. This includes: -

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with BTG's requirements.

BTG requires suppliers to vouch that: -

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They provide employees with regular pay that is fair and just and in-line with the minimum wage/real living wage standards
- They do not withhold salaries for any reason

- They carry out 'right to work checks' and exercise due diligence in checking documentation
- Their supply chain is committed to the highest standards of integrity and social responsibility and comply with relevant laws and regulations.

6. BTG policies and procedures

BTG operates the following policies for identifying and preventing slavery and human trafficking in its own operations: -

- **Whistleblowing Policy:** - BTG encourages employees, volunteers, clients and suppliers to report any concerns or suspicions of slavery or human trafficking without fear of retaliation.
- **Safeguarding Policy:** - BTG believes that everyone it comes into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. BTG will not tolerate abuse and exploitation by staff, volunteers or the wider community. BTG is committed to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.
- **Codes of Conduct:** - BTG code encourages employees and volunteers to do the right thing by clearly stating the actions and behaviours expected of them when representing BTG
- **Supplier Code of Conduct** BTG has produced a Supplier Code of Conduct and Supplier Checklist, which outlines and clearly states the actions, behaviours and due diligence expected from its suppliers when conducting their business. This ensures that our suppliers meet BTG's aims and commitment to prevent modern slavery and human trafficking.
- **Equality, Diversity and Inclusion Policy:** BTG is committed to creating a working environment free of bullying, harassment, victimisation and unlawful discrimination, including modern slavery and human trafficking, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

7. Awareness of Modern Slavery

BTG has raised awareness of modern slavery issues by providing training and information to employees and volunteers which identifies: -

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and risk to the organisation
- How employees can identify the signs of slavery or human trafficking
- What help is available to victims of slavery
- An agreement with employees and volunteers that they agree to abide by BTG's anti-slavery policies and practice.

In addition, BTG also provides a checklist for its suppliers which requires them to be mindful of modern slavery and human trafficking and requires them to: -

- undertake an audit of their policies, practices and procurement procedures to prevent modern slavery and human trafficking within the supply chain
- encourage their supply chain to be aware of, and address, issues of modern slavery and human trafficking
- understand the steps and actions BTG will take if one of its Suppliers fails to implement anti-slavery policy and controls

8. Measuring How We Perform

BTG will monitor its performance and controls to combat modern slavery and human trafficking within its organisation and supply chain.

These will include: -

- Monitoring how many employees and volunteers have completed Modern Slavery training
- Ensuring its suppliers have all received a copy of BTG's 'Suppliers Code of Conduct'
- Monitoring how many of its suppliers have completed and returned the Supplier checklist and following up non-compliance with the appropriate suppliers

- Monitoring reports of concern from our employees and volunteers that indicate a suspicion that modern slavery or trafficking may be taking place
- An annual audit of BTG's policy and procedures to review how the organisation is addressing modern slavery and human trafficking. The outcome of the audit will be reported to the following Board of Trustees meeting.

9. Reporting Modern Slavery and Human Trafficking

Slavery and human trafficking may be closer to you than you think. There could be victims of exploitation working in domestic servitude or forced labour in our local communities or a neighbour on your street.

If you suspect modern slavery, report it to the [Modern Slavery Helpline](#) on 08000 121 700 or the police on 101. In an emergency always call 999. Don't leave it to someone else. Your information could save a life.