



## **Bridging the Gap (Manchester)**

### **Modern Slavery and Human Trafficking Policy**

Registered Charity Number: 1170952

This policy will be reviewed annually, or sooner if there are significant changes in legislation, guidance, organisational structure, or identified risks.

This policy should be read in conjunction with: -

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

Date reviewed: 31/01/2026

Reviewed by: Michelle McHale

Next review due: 31/01/2027

#### **Contents**

1. At a Glance
2. Definitions
3. Background
4. Scope
5. Roles and Responsibilities
6. Business and Supply Chains
7. Assessing the Risks
8. BTG Policy and Procedures
9. Awareness and Training
10. Measuring Performance
11. Reporting Modern Slavery and Human Trafficking

## 1. At a Glance

### What Modern Slavery Is

Modern slavery occurs when a person is exploited for someone else's gain and cannot refuse or leave due to coercion, deception, threats, or abuse of power. It includes forced labour, human trafficking, debt bondage, domestic servitude, sexual exploitation, criminal exploitation, and other forms of abuse.

### Key Signs to Look Out For

People experiencing exploitation may show one or more of the following indicators:

#### Identity & Documentation

- No passport, ID, or personal documents
- Someone else holding their documents

#### Living & Working Conditions

- Unclear or inconsistent address
- Living and working at the same location
- Multiple unrelated people registered at the same address
- Poor living conditions, overcrowding, or signs of neglect

#### Behaviour & Presentation

- Appearing frightened, withdrawn, anxious, or unable to speak freely
- Someone else speaking for them or accompanying multiple clients
- Malnourishment, ill-fitting or damaged clothing, signs of poor health

#### Financial & Control Indicators

- No access to their own money
- Saying they have very little left after paying for accommodation
- Being transported to and from work by someone else

You do **not** need to be certain. Suspicion alone is enough to report.

### What To Do If You're Concerned

**1. Notice** - Trust your instincts. If something feels wrong, it probably is.

**2. Record** - Write down what you saw, heard, or were told — factually and without interpretation.

### 3. Report

- **Volunteers:** report to your **Team Leader**
- **Staff:** report to **BTG's Safeguarding Officer**

4. **Do not investigate** — this is the role of trained professionals

### 5. External Support

If you believe someone may be a victim:

- **Modern Slavery Helpline (24/7): 08000 121 700**
- **Police:**
  - 999 in an emergency
  - 101 for non-urgent concerns

BTG will support any staff member or volunteer who raises a concern in good faith.

## 2. Definitions:

### Modern Slavery

As defined by Anti-Slavery International, modern slavery occurs “when an individual is exploited by others for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom.”

### Forced Labour

Work or services people are forced to do against their will, usually under threat or punishment.

### Debt Bondage

People trapped in poverty borrow money and are forced to work to repay the debt, losing control over employment conditions and repayment.

### Domestic Servitude

Domestic work becomes servitude when a person is exploited, controlled, or hidden from view, often lacking legal protection.

### Human Trafficking

Defined by the Council of Europe Convention (2005) as the recruitment, transportation, transfer, harbouring or receipt of persons through coercion, deception, abuse of power, or vulnerability for the purpose of exploitation.

## **Child Criminal Exploitation (CCE)**

The coercion, manipulation, or control of a child (under 18) into criminal activity, including drug distribution, theft, or fraud. CCE is a form of child abuse.

## **County Lines**

A form of criminal exploitation where illegal drugs are transported across areas using dedicated phone lines. Children and vulnerable adults are often exploited to move or store drugs.

## **Labour Exploitation Indicators**

May include:

- Excessive hours with little or no pay
- Wages withheld or controlled
- No employment contract
- Recruitment fees or deductions
- Overcrowded tied accommodation
- No PPE or unsafe working conditions
- Threats, intimidation, or restricted movement

## **3. Background**

Modern slavery is a serious crime and a violation of human rights. It affects an estimated 40.3 million people globally and approximately 136,000 people in the UK. Victims may be hidden, fearful, or unable to seek help.

BTG is committed to the highest standards of integrity and expects the same from all suppliers.

Although BTG is below the £36 million turnover threshold for mandatory reporting, the organisation chooses to voluntarily comply with the principles and expectations of the Modern Slavery Act 2015 as a matter of good governance and ethical practice.

## **4. Scope**

This policy applies to all:

- BTG staff
- Volunteers
- Trustees
- Contractors
- Suppliers.

BTG has a zero-tolerance approach to modern slavery and human trafficking.

## **5. Roles and Responsibilities**

BTG's commitment to preventing modern slavery and human trafficking relies on clear responsibilities across the organisation. The following roles have specific duties to ensure concerns are identified, reported, and acted upon appropriately.

### **Trustees**

- Provide strategic oversight and ensure BTG meets its legal and ethical obligations regarding modern slavery and human trafficking.
- Approve this policy and review annual reports on BTG's performance, risks, and compliance.
- Ensure appropriate systems, resources, and training are in place to prevent exploitation within BTG's operations and supply chains.
- Hold senior staff accountable for implementing this policy effectively.

### **Safeguarding Officer**

- Acts as the organisational lead for modern slavery concerns.
- Receives and assesses reports from staff and volunteers, ensuring timely and appropriate action.
- Liaises with external agencies (e.g., Modern Slavery Helpline, police, Align/Trussell Trust) where required.
- Ensures all staff and volunteers receive induction and refresher training.
- Maintains secure records of concerns, actions taken, and outcomes.
- Provides updates to the Board of Trustees on emerging risks, trends, and safeguarding implications.

### **Team Leaders**

- Provide day-to-day oversight of volunteers during food hub sessions and other activities.
- Act as the first point of contact for volunteers who raise concerns or observations.
- Ensure volunteers understand the signs of modern slavery and know how to report concerns.
- Escalate concerns promptly to the Safeguarding Officer.
- Support volunteers in recording factual information and maintaining confidentiality.

## **Volunteers**

- Remain alert to signs of modern slavery and human trafficking during their interactions with clients.
- Report any concerns or suspicions to their Team Leader without delay.
- Do not investigate or attempt to verify concerns themselves.
- Participate in induction and refresher training as required.
- Treat all clients with dignity, respect, and sensitivity.

## **Suppliers**

- Comply with BTG's Supplier Code of Conduct and all relevant laws relating to modern slavery and human trafficking.
- Ensure their own supply chains uphold ethical labour standards and conduct appropriate due diligence.
- Provide BTG with accurate information about their employment practices when requested.
- Take prompt corrective action if concerns are raised about their practices or those of their subcontractors.
- Understand that BTG may suspend or terminate relationships with suppliers who fail to meet required standards.

## **6. Business and Supply Chains**

BTG operates in the UK but recognises that suppliers may have international supply chains. Supplier onboarding includes due diligence checks on compliance, reputation, and labour standards.

BTG has not been made aware of any allegations of modern slavery within its supply chain. Any concerns would be acted upon immediately.

## **7. Assessing the Risks**

BTG assesses risks associated with its expanding supply chain and conducts checks to ensure compliance with legal and ethical standards.

### **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:

- Ensuring suppliers:
  - Do not use forced labour
  - Provide fair pay and lawful contracts
  - Conduct right-to-work checks
  - Maintain ethical supply chains
- Requiring improvements where needed
- Sanctioning non-compliant suppliers

### **Spotting the Signs**

BTG is well placed to identify indicators of exploitation. Signs include:

- No ID
- Unclear address
- Same person accompanying multiple clients
- Fearful or controlled behaviour
- Malnourishment or poor clothing
- Very limited money after paying for accommodation

Volunteers report concerns to Team Leaders; staff report to the Safeguarding Officer.

Trussell operates a support line operated through their partners (Align) who can offer expert advice about what a food bank should do next when they have identified a potential modern slavery issue. **The Trussell's support line is available to food banks 9am-5pm on weekdays by dialling 01722 580 358.** They also have a dedicated email box: [modernslavery@trusselltrust.org](mailto:modernslavery@trusselltrust.org).

### **8. BTG policies and procedures**

BTG operates the following policies to prevent exploitation:

- Whistleblowing Policy
- Safeguarding Policy
- Codes of Conduct
- Supplier Code of Conduct

- **Recruitment Policy (including right-to-work checks and fair recruitment practices)**
- Equality, Diversity and Inclusion Policy

## **9. Awareness and Training**

BTG provides training covering:

- Forms of modern slavery
- Signs and indicators
- Reporting routes
- Support available to victims

### **Training Frequency**

- Induction for all new staff and volunteers
- Refresher training every two years
- Additional training if legislation or guidance changes

### **Who Delivers Training**

- BTG's Safeguarding Officer or trained internal lead
- External specialists where appropriate

## **10. Measuring How We Perform**

BTG reviews its controls annually, including:

- Training completion rates
- Supplier compliance
- Reports of concern
- Annual audit of this policy, with outcomes reported to trustees

## **11. Reporting Modern Slavery and Human Trafficking**

Some modern slavery concerns may also meet BTG's safeguarding thresholds. A safeguarding referral must be made when:

- A child (under 18) may be at risk of harm, exploitation, or abuse
- An adult is at risk of harm due to coercion, control, or vulnerability
- There is immediate danger to any person

- The concern involves criminal exploitation such as CCE or county lines

Where safeguarding thresholds are met, staff must report directly to the **Safeguarding Officer**, who will determine whether a referral to statutory services is required.

If you suspect modern slavery report to:

- [Modern Slavery 24 hour Helpline](#) on 08000 121 700, which is free, confidential and is available in 200 different languages.
- Police: **999** (emergency) / **101** (non-emergency)

**Staff and volunteers must not investigate.** Their role is to notice, record, and report.

**BTG will support anyone who raises concerns in good faith.**

Your information could save a life.

The Gangmasters and Labour Abuse Authority leads on investigations.