

Modern Slavery and Human Trafficking Policy

Organisation and Structure

The Diversity Trust CIC is a Community Interest Company - Limited by Guarantee. We provide training, education, awareness and campaigns on Equality, Diversity, Equity and Inclusion in the UK and Europe <https://www.diversitytrust.org.uk>

We have a team of employees and sub-contractors; you can see the team on our website <https://www.diversitytrust.org.uk/meet-the-team/>

We have an annual turnover of £178,000 (2021-22).

People are engaged in our work in the UK and Europe.

Definitions

The Diversity Trust CIC considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical coercion
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity, or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Policy Statement

Modern slavery and human trafficking are covered in the provisions of the Modern Slavery Act (2015). The term 'modern slavery' describes anyone forced into labour, owned or controlled by an 'employer', treated as a commodity (i.e. bought or sold) or physically constrained. Human trafficking describes the practice of illegally transporting someone from one area or country to another, usually for the purposes of being sold into modern slavery. A person does not need to be taken out of their home country to be considered a victim of human trafficking. However, it is commonly accepted that the majority of modern slaves in the UK are trafficked from overseas to work in the agricultural, construction, hospitality, manufacturing and car washing industries. Additionally, many adults and children are trafficked and sold for domestic slavery or sexual exploitation.

Commitment

The Diversity Trust CIC acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains and partners.

The organisation does not enter into business with any other organisation in the United Kingdom, or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No workers engaged by the organisation are obtained by means of slavery or human trafficking. The organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

Potential Exposure

The organisation considers its main exposure to the risk of slavery and human trafficking to exist within its delivery of its core activities and services.

In general, the organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, we have taken steps to ensure that such practices do not take place in the organisation, and in any organisation that supplies goods and/or services to us.

Steps

The organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in the organisation or supply chains, including conducting a review of the controls of suppliers.

The organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- suppliers and sub-contractors are verified to comply with the Act
- employees are vetted to ensure that their circumstances comply with the Act
- clients, where applicable, have a policy that stringently and actively ensures compliance with the Act

Company Suppliers

We have a zero-tolerance commitment to slavery and human trafficking must also stand with our contractors and suppliers. We will use due diligence to find and use suppliers who will also demonstrate a commitment against modern slavery and human trafficking. We will regularly carry out supplier audits to ensure that they all adhere to our standards.

We are committed to:

- reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- having measures in place to identify and assess the potential risks in our supply chains
- undertaking impact assessments of our services upon potential instances of slavery
- creating action plans to address risk to modern slavery
- taking any actions to embed a zero-tolerance policy towards modern slavery
- carrying out training provided to staff on modern slavery and human trafficking

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the organisation's obligations. This includes the duty to notify the Home Office.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed regularly.

Contact

Phone 07720 294 991

Email info@diversitytrust.org.uk