



Modern slavery POLICY STATEMENT

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Headway Birmingham & Solihull has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Headway Birmingham & Solihull has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

A brain injury charity based locally only, working across Birmingham and Solihull. We work with brain injured people and their families, providing support to just over 2000 people in the last year.

Our high risk areas

Our highest risk areas are financial. As a charity we charge for some of our services, but at a cheaper rate than it costs us. Some of the services are not charged for and therefore overall we have a high financial pressure each year to find the required funding to maintain all the services.

We try to mitigate this risk as much as is possible for a charity by planning and having good monitoring and strategies in place.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Modern Slavery	Gov4.b.	Version 2
Last Update: Dec 2019		Review Date : 2021

1. Modern Day-slavery policy. This policy sets out the organisation’s stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.]

Our suppliers

Headway Birmingham & Solihull operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They pay their employees at least the national minimum wage / national living wage (For international suppliers)
3. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

Modern Slavery	Gov4.b.	Version 2
Last Update: Dec 2019		Review Date : 2021

This statement was approved by the Board of Directors on 1/2/2019

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