Anti-Slavery & Human Trafficking Policy

Owner: *Chief Executive Officer*
Relevant to: Staff and stakeholders (including volunteers)

Office Use only:

Department Family:	**SLT Owner:**	**Approval/Re-approval Date:**	**Implementation Date:**	**Next Review Date:**
Finance	Director of Finance and Administration	July 2026	01 January 2024	July 2026

New Policy or Substantive Policy Review

Version	Date	Policy Development Agreed by *(SLT Owner)*	Policy Development Author	Draft Policy Verified by	Policy Approval	Impact Assessment *(if applicable)*
V1	01 January 2024	CEO	RHB HR Manager	CEO	CEO	Completed

Rationale for new or substantive policy review	As part of the 2023 Review of all policies it was determined that the Headway UK should have an Anti-Slavery and Human Trafficking Policy to demonstrate its commitment and expectations of staff, service users and stakeholders.

Please make explicit if change/review relates to procedures, guidelines and associated documents only

Periodic Policy Review / Change History

Version	Date of Review / Revision	Description of Change	Reviewed By	Approved By *(SLT Owner)*
V2	30 January 2025	Annual Review of policy - no changes	RHB	RHB
V3	July 2026	Annual review – no changes	RHB	RHB

Communication

To be agreed by SLT Team

All Staff Email	x	Team Meetings	
Newsletter		External website	x

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1. Policy Statement

This policy outlines Headway – the brain injury association's (Headway UK), ethical approach through the procurement process to modern slavery and human trafficking within the supply chain.

2. Definitions

As per The Modern Slavery Act 2015:

Slavery/servitude: a person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude.

Forced or compulsory labour: a person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

Human trafficking: where a person arranges or facilitates the travel of another person with a view to that other person being exploited, with or without their consent.

Exploitation: This can be in addition to the above areas, sexual exploitation (e.g. forced into prostitution), removal of organs, securing services by force, threats or deception, securing services from children and vulnerable persons (including an individual being forced into committing criminal acts against their will as a possible debt-bondage process).

3. Principles

Headway UK is committed to operating ethically, adhering to EU and UK best purchasing practice, and complying with the relevant statutory requirements and guidelines.

We are also committed to diversity and inclusion, which underpins our approach to modern slavery and human trafficking.

In addition to these, specific principles applied are:

- there is a commitment that modern slavery, forced labour, exploitation and human trafficking have no place within the supply chain for Headway UK.
- there is a commitment that all service users, our staff and stakeholders, are safe as articulated within our safeguarding policies and procedures.
- there is a commitment to continually review the supply chain with a view to identifying any risks of modern slavery in relation to Headway UK or Headway Retail Limited and put in place procedures and actions to ensure there is no slavery or human trafficking within our supply chains.

The combination of these principles is weighted towards minimising risk of non-compliance with the Act, and positively promoting anti-slavery and anti-human trafficking both within Headway and with our stakeholders.

4. Scope and Limitations

This policy is focussed on the procurement activities within its supply chain for goods and services procured.

5. Responsibilities

The Chief Executive Officer is responsible for the overall compliance of Headway UK with the Act.

The Director of Finance and Administration is responsible for the procurement operations. They will liaise with the Chief Executive Officer where there are any issues in relation to compliance with the Act.

All staff within Headway UK who have the authority to make procurement decisions on behalf of Headway UK have a responsibility to ensure that they are complying with the Act.

6. Implementation Arrangements

All new relevant members of staff are made aware of the policy and requirements during the staff induction process. Updated and amended procedures are disseminated in accordance with the policy review dates.

Ensuring awareness and compliance in the supply chain requires specific due diligence arrangements to be undertaken and put in place.

Training and updating of information is carried out with relevant staff to increase awareness of the requirements.

7. Monitoring and Review

This policy will be reviewed annual or in line with any changes to legislation.

8. Supporting/Related Documents

The Whistleblowing Policy provides guidance on what to do if there are concerns that an area of prohibited conduct is being carried out by Headway UK.

The Safeguarding Policy provides guidance on what to do if there are concerns in relation to the safeguarding of an adult at risk.

The Recruitment Policy and staff code of conduct also provide the framework to ensure that staff are not exploited or exposed to prohibitive conduct.