

Human trafficking and modern slavery policy

Policy owner	Centre Director
Last reviewed date	24/2/26
Next review	Jan 27
Related Policies	Safeguarding Policy, Recruitment Policy, Whistle-blower Policy

1. Introduction

Human trafficking and modern slavery are crimes and violations of fundamental human rights. They include slavery, servitude, forced and compulsory labour, and the trafficking of people for exploitation. Bendrigg Trust is committed to ensuring that neither modern slavery nor human trafficking occurs within our organisation or supply chains.

As an outdoor activity centre for disabled people, Bendrigg Trust promotes dignity, respect, and equality. We recognise our responsibility to take a robust approach to both modern slavery and human trafficking and are committed to acting ethically and with integrity in all our relationships.

This policy applies to all staff, whether on the payroll or freelance, and volunteers.

2. Aims and Scope of Policy

This policy aims to:

- Set out Bendrigg Trust's commitment to preventing modern slavery and human trafficking in its operations and supply chains
- Provide guidance to staff and volunteers on identifying and reporting concerns related to exploitation
- Ensure appropriate steps are taken to investigate and respond to any concerns raised
- Promote transparency and accountability in our practices and relationships

This policy covers:

- Recruitment and employment practices
- Procurement of goods and services
- Partnerships and collaborations
- Any other activities where there is a risk of exploitation

3. Understanding Human Trafficking

Human trafficking involves the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them. Exploitation may include:

- Forced labour
- Sexual exploitation
- Domestic servitude
- Criminal exploitation (e.g. forced begging, theft, drug trafficking)
- Organ harvesting

Victims may be adults or children, UK nationals or foreign nationals, and may not always recognise themselves as victims.

4. Safeguards

Bendrigg Trust is committed to fair and lawful employment practices. We ensure that:

- All staff and volunteers work freely and are not subject to forced or bonded labour
- Recruitment processes are transparent and comply with UK employment law
- No fees are charged to individuals for employment opportunities
- All staff are paid at least either the National Minimum Wage or the National Living Wage (depending on their age).

We expect all suppliers and contractors to uphold the same standards and will take appropriate action if concerns arise.

5. Identifying and Raising a Concern

If you suspect that someone working with or for Bendrigg Trust may be a victim of modern slavery or human trafficking, you should raise your concern with your line-manager in the first instance. If you believe senior staff may be involved or if you feel unable to raise the matter internally, you may contact the Centre Director or the Chair of Trustees.

Concerns may be raised verbally or in writing. Written concerns should include:

- The background and history of the concern (including relevant dates)
- The reason why you are particularly concerned about the situation

You are not expected to prove the concern, but you must have reasonable grounds to believe that exploitation may be occurring.

6. How Bendrigg Trust Will Respond

All concerns will be taken seriously and treated confidentially. Bendrigg Trust will:

- Acknowledge receipt of the concern within ten working days
- Assess the nature of the concern and determine the appropriate course of action
- Investigate the matter internally or refer it to external authorities if necessary
- Inform you of the outcome, subject to legal constraints

The Centre Director will maintain a record of concerns raised and report to the Chair of Trustees as necessary.

7. How The Matter Can Be Taken Further

If you are not satisfied with the response from Bendrigg Trust, or if you feel it is appropriate to raise the matter externally, you may contact:

- The Modern Slavery Helpline (tel: 08000 121 700)
- Public Concern at Work (tel: 020 7404 6609)
- The Police

If you do take the matter outside Bendrigg, you must ensure that you do not disclose confidential information.