

## 1. Introduction

1.1 Modern slavery is a serious and organised crime that destroys communities and causes significant harm to victims. It is the illegal exploitation of people for personal or commercial gain, and involves people being coerced and forced into providing a service to others. It is a crime that affects people of all genders, ages (including children) and ethnicities and is a violation of fundamental human rights.

1.2 Some estimates suggest that there are approximately 40 million people living in slavery across the world, many of whom will be working to produce the goods and services which are bought and sold every day. The Home Office estimated that there were over 10 thousand potential victims in the UK alone in 2013.

1.3 Worldwide, the International Labour Organisation estimates hundreds of billions of illegal profits are generated by traffickers per year. Unscrupulous businesses who use slave labour undercut businesses and if this horrendous crime is to be eradicated from the UK and the rest of the world, government and businesses must work together.

## 2. Zero Tolerance

2.1 Unique Fundraising adopts zero tolerance to modern slavery and human trafficking, and all forms of corruption and bribery, directly and indirectly, associated with these criminal acts. While

2.2 Modern slavery is so pervasive that it is likely to exist in the supply chains of the goods and services purchased by companies. Unique Fundraising is committed to ensuring that the business does not inadvertently fund this criminal activity and is committed to protecting vulnerable workers in its own supply chains from exploitation or harm.

2.3 Unique Fundraising fully supports the government's objectives to eradicate modern slavery and human trafficking.

2.4 Unique Fundraising believes that everyone has a right to be treated with dignity and respect at all times and under all circumstances.

## 3. Definitions

3.1 Modern slavery is the term used within the UK and is defined within the Modern Slavery Act 2015 (the 'Act'). The term is used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

3.2 Human trafficking is where a person arranges, or facilitates, the travel of another person with a view to that person being exploited.

## 4. Policy Aims

4.1 This policy provides a framework to ensure:

no such abuse is tolerated, an open and transparent approach is required by Unique Fundraising and our suppliers, to ensure we take steps to identify and tackle any instances of modern slavery in our supply chain.

## 5. Responsibilities and Accountabilities

5.1 Unique Fundraising recognises that it is responsible for promoting ethical business practices and policies that protect workers from being abused or exploited.

5.2 The prevention, detection and reporting of modern slavery in any part of Unique Fundraising or its supply chain is the responsibility of all those working for us or on our behalf. Any passholder must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.

5.3 Therefore, this policy applies to all persons working for Unique Fundraising or on behalf of Unique Fundraising, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents and contractors.

5.4 The Executive Board have overall responsibility for ensuring this policy complies with its legal and ethical obligations, and that all those under our control comply with it. The In House compliance Team currently has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any related queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

## 6. Contractor Responsibilities

6.1 Unique Fundraising requires all organisations with whom it is engaged to ensure that their goods, services, materials and labour-related supply chains:

- Fully comply with the Act.
- Are clear, transparent, accountable and auditable.
- Are free from ethical ambiguities.

6.2 Unique Fundraising expects that its contractors operate to the highest level of ethical standards.

6.3 Unique Fundraising acknowledges that contractors may be at different stages of their journey towards having more ethical supply chains but expects to see them demonstrate continuous improvement in how modern slavery risks are mitigated.

6.4 Unique Fundraising may require contractors who engage workers through a third party to obtain that third party's agreement to adhere to this policy and demonstrate how they seek to tackle any Modern Slavery within their supply chain.

6.5 Consistent with this approach, Unique Fundraising may require employment and recruitment agencies, and other third parties supplying workers to teams in either Administration, to demonstrate their compliance with this policy.

## 7. Awareness and Training

7.1 Unique Fundraising will raise awareness of this policy (and the Act) by notifying third parties in our frameworks, delivery partnerships and other organisations with which we regularly engage.

7.2 The Compliance Team will explore opportunities to raise awareness of this policy (and the Act).

7.3 The policy will be published on the company website and internal networks.

7.4 Training will include how to identify the risks of modern slavery and ensure that suspected instances are handled correctly.

7.5 Unique Fundraising will provide modern slavery information, advice and guidance to contractors. Where feasible.

7.6 Unique Fundraising will maintain records of all members of staff who have completed modern slavery training.

## 8. Assurance and Transparency

8.1 Unique Fundraising has committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within the business.

8.2 Unique Fundraising takes a risk-based approach to its procurement, contract management and supply chain management processes in relation to modern slavery and keeps them under continuous review.

8.3 As part of ongoing risk assessment and due diligence processes, Unique Fundraising will consider whether circumstances warrant the auditing of contractors to demonstrate their compliance with this policy.

## 9. Non-Compliance, Reporting and Victim Support

9.1 If any member of Unique Fundraising is discovered to have breached this policy, then appropriate action will be taken.

9.2 If any contractor is found to have breached this policy, then appropriate action will be taken; this may range from considering the possibility of breaches being remediated, to terminating agreements.

9.3 Individuals who have reasonable suspicion or evidence of non-compliance with the Act in connection with any member of Unique Fundraising are encouraged to report their concerns to [hr.department@uniquefundraising.org](mailto:hr.department@uniquefundraising.org).

9.4 Alternatively, if any member of Unique Fundraising holds information that could lead to the identification, discovery and recovery of victims of modern slavery or human trafficking in the UK:

- Contact the Modern Slavery Helpline on 080 0012 1700 (open 24 hours a day, 365 days a year)
- [Report it online to the Modern Slavery Helpline](#)

9.5 If you think you are a victim of modern slavery or human trafficking:

- Contact the Modern Slavery Helpline on 080 0012 1700
- Contact the Victim Support Helpline on 080 8168 9111

## 11. Policy Review

11.1 This policy will be reviewed on an annual basis, to establish whether Unique Fundraising's approach continues to follow best practice by:

- Assessing and interpreting any recent or emerging case law and best practice.
- Re-evaluating the risk of non-compliance as part of our annual risk management and assurance processes.