



Mental Health Matters Wales

Anti-Slavery and Human Trafficking Policy

Introduction

MHM Wales provides a variety of support services to a wide range of individuals which include those who are vulnerable to exploitation. MHM Wales is committed to acting fairly and ethically wherever we do business and condemns corruption in all its forms and will not tolerate it in our business or in those we do business with.

Definition of Modern Slavery

Someone is in slavery if they are:

- forced to work – through coercion, or mental or physical threat
- owned or controlled by an 'employer', through mental or physical abuse or the threat of abuse
- dehumanised, treated as a commodity or bought and sold as 'property'
- physically constrained or have restrictions placed on their freedom of movement

Policy

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our charity business dealings and relationships and to ensure modern slavery is not taking place anywhere in our own charity, or in any of the services we contract to both as a supplier or purchaser.

MHM Wales is committed to ensuring transparency in our own services and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015.

MHM Wales employs approximately 28 staff and has approximately 15 volunteers engaged in delivering and supporting a range of activities. All staff and some volunteers, as appropriate, receive mandatory safeguarding training which outlines the risks, signs and dangers of Modern Slavery.

Given the nature of our work, the charity's policies address Modern Slavery particularly in the context of safeguarding vulnerable children, young people and adults.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

MHM Wales's Supply Chain

Where support services, i.e. Information Technology support, Accountant's, Human Resource services, etc. are commissioned, we require suppliers of services to provide evidence of their Modern Slavery Policy. If a supplier is unable to provide evidence of their policy we will exclude them from our supplier list.

Many of the services MHM Wales delivers are commissioned by NHS services or Local Authorities which, as being identified as *large businesses* are required to disclose the steps they have taken to ensure their business and supply chains are free from modern slavery.

RESPONSIBILITY FOR THE POLICY

The Executive Committee of MHM Wales has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and it is the responsibility of the CEO to ensure all staff and volunteers comply with it.

COMPLIANCE WITH THE POLICY

All staff members and volunteers must ensure you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our charity or supply chains is the responsibility of all those working for MHM Wales or under our control. Everyone is required to avoid any activity which might lead to, or suggest, a breach of this policy.

We encourage all staff members and volunteers to report any concerns regarding modern slavery and/or human trafficking in any parts of our business or supply chains in accordance with our whistleblowing policy, we also encourage staff members and volunteers to discuss a specific matter (or our policy or relevant legislation) with your relevant line manager, or where concerns relate to your line manager the next manager in line.

If staff members or volunteers are in any doubt about whether a particular act or working conditions in any of our business relationships may contravene any aspect of this policy we encourage the reporting of it in accordance with the whistleblowing policy, or speak to a member of management.

We encourage openness and will support anyone who raises genuine concerns in good faith in accordance with the charities whistleblowing policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their knowledge, or suspicion, that modern slavery is taking place in any part of our charity or in any of our supply chains.

COMMUNICATION AND AWARENESS OF THIS POLICY

Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any employee who breaches this policy may face disciplinary action, which can result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.