

Modern Slavery (Anti-Slavery and Human Trafficking) Policy

NATIONAL WINDRUSH MUSEUM (NWM)

Last updated July	/ 2022
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Purpose

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another, in order to exploit them for personal or commercial gain.

NWM has a zero-tolerance approach to modern slavery. NWM is committed to acting ethically and with integrity in our business dealings and relationships and to implementing and enforcing systems and controls to ensure modern slavery is not taking place in our business or in our supply chains.

NWM is committed to ensuring transparency in business and in our approach to tackling modern slavery throughout our supply chains, consistent with disclosure obligations under the Modern Slavery laws/Act 2015. We expect the same standards from our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

WHO MUST COMPLY WITH THIS POLICY?

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

RELATED POLICIES AND PROCEDURES

This Modern Slavery (Anti-Slavery and Human Trafficking) Policy interacts with the following workplace policies and procedures. Staff are encouraged to familiarise



themselves with the policies detailed below. If you have any queries about this policy, please contact your manager.

- Whistleblowing policy
- Equality & Diversity
- Safeguarding

RESPONSIBLE FOR THIS POLICY

NWM's Trustees have overall responsibility for ensuring this policy with senior managers comply with our legal and ethical obligations and that all staff comply with it. The senior management have primary day to day responsibility for implementing and monitoring its effectiveness and dealing with any queries relating to the policy. It is the duty of all managers to ensure that staff are inducted, understand, implement and comply with this policy. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

This policy will be reviewed yearly. However, NWM may amend it at any time to update with best practices and processes.

COMPLIANCE WITH THIS POLICY

All staff must ensure that they read, understand, and comply with this policy.

Preventing, detecting, and reporting modern slavery in any part of NWMs business or supply chains is the responsibility of those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

HOW AND WHEN TO NOTIFY IN CASE OF NON-COMPLIANCE

If a staff /member believes or suspect that a breach of this policy has occurred, or may occur in the future, they must inform a Board Director immediately.

Staff/Members are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.

If a staff/ member believes or suspects a breach of this policy has occurred or that it may occur, then they must notify the board Directors at the earliest possible stage. If a staff/Member is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should raise it with the Board Directors at the earliest possible stage.

NWM encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. NWM is committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part the business or in any of the supply chains. (**Detrimental treatment**



includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern).

If a staff/Member believes that they have suffered any such treatment, they should inform The Board Directors at the earliest possible stage. If the matter is not remedied, and you are an employee, you should raise it formally with the Chair of the Board who will consult with the other Board Directors and take appropriate action.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk NWMs business faces from modern slavery, forms part of the regular training for our NWM staff/Members.

NWM has commitment to addressing issues of modern slavery in our business and supply chains, which is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any Staff/Member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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