
1.0 Introduction

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, compulsory labour and human trafficking for exploitation, and can have a significantly adverse impact on individuals and their family members across the world.
- 1.2 We have a zero tolerance approach to modern slavery across all areas of our organisation, as well as in our supply chains. We are committed to ensuring we are not connected to modern slavery in any way. We aim to ensure that our business operates in an open and transparent way and our approach to tackling modern slavery throughout our supply chains is consistent with our obligations under the Modern Slavery Act 2015.
- 1.3 We aim to work in partnership with all our contractors, suppliers, and other business partners to ensure that they share and work towards the same values we hold against slavery and human trafficking. To manage this, 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, and we expect that our suppliers will hold their own suppliers to the same high standards. We also ask our suppliers to confirm their compliance with Modern Slavery Act 2015 as necessary.
- 1.4 We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- 1.5 This policy applies to all persons working for us 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. All employees must ensure that they have read, understand and comply with this policy.

2.0 Purpose

- 2.1 This policy aims to prevent modern slavery and human trafficking in Saffron's operations, services, and supply chains by ensuring robust governance, risk assessment and due-diligence processes. This policy intends to set clear expectations for all employees, contractors, suppliers, and business partners regarding the identification, prevention, reporting, and management of modern slavery risks.

- 2.2 Saffron endeavours to promote transparency and accountability in accordance with the Modern Slavery Act 2015, including the preparation and publication of an annual Modern Slavery Statement where legally required.
- 2.3 This policy ensures compliance with UK legislation and statutory guidance, and embeds best practice across procurement, contract management, recruitment, safeguarding, and frontline service delivery.
- 2.4 This Policy applies to all employees, officers, agency workers, volunteers, contractors and suppliers working with or on behalf of Saffron.

3.0 Scope

- 3.1 As part of our initiative we have in place systems to:
 - 3.1.1 Identify and assess potential risk areas in our supply chains;
 - 3.1.2 Mitigate the risk of slavery and human trafficking occurring in our supply chains;
 - 3.1.3 Monitor potential risk areas in our supply chains; and
 - 3.1.4 Protect whistle blowers.
 - 3.1.5 The prevention, detection and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains at the earliest possible stage.
- 3.2 If an employee believes or suspects a breach of this policy has occurred or there is a risk of a breach occurring, they must notify their manager or report it in accordance with our Speaking Up (Whistleblowing) Policy as soon as possible.
- 3.3 We encourage openness and will support anyone who raises genuine concerns in good faith under this 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 suspicion that modern slavery of whatever form is or may be taking place in any part of our organisation or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an

employee believes that they have suffered any such treatment, they should inform the People Team immediately. If the matter is not remedied, an employee should raise it formally using our Grievance Procedure.

4.0 Legislation and Compliance Framework

- 4.1 Modern Slavery Act 2015
- 4.2 Section 54 (Transparency in Supply Chains)
- 4.3 Public Interest Disclosure Act 1998
- 4.4 Care Act 2014
- 4.5 Children Act 1989 & Children Act 2004

5.0 Definitions

- 5.1 'Modern slavery' includes slavery, servitude, forced or compulsory labour and human trafficking.
- 5.2 Indicators of modern slavery can include abuse of vulnerability, deception, restriction of movement, retention of documents, debt bondage, abusive working and/or living conditions, and excessive overtime.
 - 5.2.1 For example, this could present as labour exploitation, where a contractor might have workers committing to excessive overtime.
- 5.3 'PPN 02/23' refers to the Procurement Policy Note 02/23.

6.0 Roles and Responsibilities

- 6.1 The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- 6.2 The Chief Executive will sign the Modern Slavery Statement after its approval and ensure publication of the policy and statement to the organisation's website.
- 6.3 The Head of Governance has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 6.4 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 6.5 The Procurement Team are responsible for implementing **PPN 02/23**

risk-based controls; ensures modern slavery terms in all relevant contracts and monitors subcontracting.

- 6.6 All contractors and suppliers within our supply chain are required to confirm compliance to this policy.

7.0 Policy Statement

- 7.1 In line with Section 54 of the Modern Slavery Act (2015), Saffron is required to publish an annual statement if Saffron's consolidated turnover exceeds the £36m threshold. The statement should aim to include information about:
- 7.1.1 The organisation's structure, its business, and its supply chain;
 - 7.1.2 Its policies in relation to slavery and human trafficking;
 - 7.1.3 Its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
 - 7.1.4 The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
 - 7.1.5 Its effectiveness in ensuring that slavery and human trafficking are not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
 - 7.1.6 The training and capacity building about slavery and human trafficking available to its staff.
- 7.2 However, if Saffron's consolidated turnover does not meet the £36m threshold, then Saffron reserves the right to voluntarily publish a statement to reflect the best practice expectations of the sector.
- 7.3 Saffron will publish this statement in a prominent location on the website.
- 7.4 The Chief Executive is responsible for making and signing the statement, and the statement will be reported to Board for information.

8.0 Monitoring and Compliance

- 8.1 Saffron will continue to monitor all trackable facets of this policy.
- 8.2 All staff will be required to complete training as part of their induction. The percentage of the completed training will be tracked and presented to Board; alongside this report will be data concerning the number of incidents raised with outcomes/investigations included; and record of supply chain due diligence, including the relevant suppliers assessed and number of contracts with modern slavery policies.

9.0 Training and Awareness

- 9.1 We are committed to providing training on this policy and on the risks

our organisation faces from modern slavery both within our organisation and in its supply chains. Training on this forms part of the induction process for all individuals who work for us, and regular refresher training will be provided as necessary.

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

9.3 **Reporting, Safeguarding, and Referrals**

9.3.1 **Immediate risk:** Call **999**.

9.3.2 **Internal reporting:** Staff must report concerns at once to their manager and the Safeguarding Lead/Head of Governance.

9.3.3 **External escalation:**

- **Modern Slavery & Exploitation Helpline (Unseen):** 08000 121 700 (24/7) or online reporting.

- **Police** via **101** where appropriate.

- **NRM / Duty to Notify:** Where indicators meet the threshold, first responders (e.g., police/local authority) must refer to the NRM or submit a DtN if an adult does not consent. Children must be referred to the NRM. Saffron will cooperate and record safeguarding actions.

- **Norfolk pathways:** Where concerns arise within Norfolk, staff should contact the Norfolk MASH for advice and multi-agency coordination.

Record-keeping: All concerns and decisions will be logged on Saffron's safeguarding system in line with MSA statutory guidance and local safeguarding procedures.

10.0 Related Policies and Documents

- 10.1 Fair Pay Policy
- 10.2 Training and Development Policy
- 10.3 Domestic Abuse Policy
- 10.4 Equality, Diversity, and Inclusion Policy
- 10.5 Anti Bribery and Corruption Policy
- 10.6 Anti Money Laundering Policy
- 10.7 Procurement Policy

Policy Title/Reference	Modern Slavery and Human Trafficking Policy	
Author/Owner	Head of Governance	
Version Number	3	
Approval Date	March 2026	
Review Date	March 2029	
Approval Authority	Audit and Risk Committee	