

Modern Slavery and Human Trafficking Statement 2019

1. Introduction

This statement sets out Working Links' actions to understand all potential modern slavery risks related to its business and to ensure steps are maintained to prevent slavery and human trafficking. This statement relates to actions and activities during the calendar year ending 31 December 2019.

Working Links' have a zero-tolerance approach to modern slavery and human trafficking and are fully committed to preventing slavery and human trafficking in its corporate activities and ensuring there is transparency across the business and supply chains.

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies which serve to address the requirements of the Modern Slavery Act 2015.

2. Our policies

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective due diligence and contractual compliance. These include:

Code of Conduct

Our code makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chain.

Whistle blowing Policy

Working Links encourages all its workers, service users, customers and business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, service users, customers or others who have concerns can use our confidential helpline.

Recruitment Policy

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.

Safeguarding Policy

Our Safeguarding policy sets out the legislative requirements to provide a duty of care, promote positive well-being and provide a clear process for escalating concerns to protect the welfare of individuals.

Equality, Diversity and Inclusion Policy

Our Equality, Diversity and Inclusion policy is in place to ensure that we treat people fairly and with respect. Working Links is committed to being an Employer of Choice and we will strive to create and implement our Equality, Diversity and Inclusion strategy.

3. Our supply chains and supplier adherence to our values

We expect the highest standards of conduct and probity throughout our supply chain, requiring all of our people to act with integrity and honesty. Our procurement processes include standard enquiries about modern slavery and trafficking and we examine our supply chain using our dedicated quality assurance functions including audit, supply chain management, legal and risk.

Working Links will continue to work with suppliers to ensure that they meet these standards and comply with the requirements of the Modern Slavery Act.

4. What we do

As part of our commitment to preventing modern slavery and human trafficking we:

1. Introduced online training on the Modern Slavery Act, which was made compulsory in 2017/2018; All Working Links employees are required to complete training on the act, including how to identify and escalate any concerns.
2. Continue to review and develop the policies, processes and controls in place to support our commitment to mitigate risks of modern slavery across our organisation.
3. Will develop and update this statement annually to meet the requirements of the Modern Slavery Act.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2019.

5. Approval

This statement has been approved by the Chief HR Officer, who will review and update it annually.

Document control

This statement will be reviewed at least annually to respond to any changes. Please refer to the [Working Links website](#) for the latest version.

This statement is owned by Human Resources.

Version	Date	Change details	Author / Editor	Approved by
1.0	22 June 2017	Statement introduced	Chris Baker	Clare Davey
1.1	8 November 2018	Statement reviewed	Michelle Cairns	Clare Davey