

## Modern Slavery Policy Statement

### Introduction

Action Deafness is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Action Deafness will perform due diligence to provide transparency throughout the organisation.

### Organisation

Action Deafness is a Deaf-led charity run by passionate specialists. Our understanding of deafness enables us to provide specialist, accessible & equal services so that Deaf people can lead full, independent lives.

Action Deafness comprises of a Board of Trustee Directors and an Executive Leadership and in total has around 100 employees.

### Our Supply Chain

The Slavery Act applies not only to the organisation's own employees but also its suppliers, sub-contractors and other business partners. There is a corporate commitment to legal compliance, ethical standards and fundamental human rights.

To satisfy the requirement, we have asked all of our suppliers to provide evidence of compliance to the following statement:

"The contractor warrants that it has thoroughly investigated its labour practices and those of its direct suppliers to ensure that there is no slavery or forced labour used anywhere in its organisation or used in any of its direct suppliers' or subcontractors' organisation. The contractor further warrants that it has put in place all necessary processes, procedures, investigations and compliance systems to ensure that the warranties made above will continue to be the case at all times. Action Deafness reserves the right to audit at any time, with prior notice, if it has reason to suspect that the above requirements have not been met."

Action Deafness will not knowingly support or deal with any businesses involved in slavery or human trafficking.

We assess ourselves to have a low risk of modern slavery in our business and supply chains. Our supply chains are limited and we procure goods and services from a restricted range of UK suppliers.

### Our Policies on Slavery & Human Trafficking

Our over-riding commitment is to act ethically and with integrity in all of our business relationships.

Specifically, our aim is to guard against the occurrence of modern slavery or human trafficking in any part of our business or at any level in our supply chain through the communication of our expectations, the implementation of appropriate procedures and the other actions that we take.

Our Safeguarding Policies for both Adults and Children are relevant along with our EDI Policy. Furthermore, our Whistleblowing Policy acts in tandem with our policies on slavery and human trafficking by encouraging staff to report concerns including any situations related to modern slavery, human trafficking and child or forced labour.

Despite our best intentions and the steps that we take, a possibility remains that without our knowledge and consent certain factors may compromise our ability to mitigate against the risk of slavery or human trafficking occurring at some level in our supply chain. When any such circumstances come to our attention, we will take prompt and decisive action with a view to remediating the situation as a first preference, whilst ultimately being prepared to terminate the offending supply relationship if necessary.

### **Training & Awareness**

Awareness of modern slavery, human trafficking and related issues is communicated to appropriate team members by all line managers as part of induction and there after on an annual basis. A copy of this policy statement is accessible to all staff electronically on Action Deafness's SharePoint.

We ensure staff involved in procurement activity are aware of and follow [modern slavery procurement guidance on GOV.UK](#) and ensure that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

### **Due Diligence**

We aim to identify modern slavery risks before we take on a new supplier and monitor them for compliance in the life of the contract. We work collaboratively with others in our sector to identify risks.

### **Responsibility**

Action Deafness Board of Trustee Directors and Executive Leadership Team will take responsibility of implementing this policy and its objectives. It will provide the necessary resources to ensure that its practices are effective in ensuring that modern day slavery is not taking place.

Action Deafness is satisfied that there is no evidence of any act of modern-day slavery or human trafficking within its own organisation for the last financial year, ending 30<sup>th</sup> September 2024.

This policy statement will be reviewed annually.

Signed:



**Craig Crowley – Chief Executive Officer**