

The logo for Yorkshire Dales Rivers Trust features the text "Yorkshire Dales" in a large, blue, serif font, with "Rivers Trust" in a smaller, blue, cursive font below it. The text is enclosed within a light blue, hand-drawn style oval shape.

Yorkshire Dales Rivers Trust

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Policy Statement

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 ("modern slavery"), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Trust has a zero-tolerance approach to modern slavery within its operations. We have undertaken a risk assessment process, and identified that the greatest areas of risk, lie within our external supply chains, as our employment processes seek to ensure that there is minimal to no risk of slavery occurring. Within our external supply chains we have identified that construction, civil engineering and groundworkers contractors pose the greatest risk of intentional or unintentional modern-day slavery.

This policy applies to all persons:

- a. working for the Trust, or on our behalf, in any capacity, including employees at all levels, CEOs, officers, agency workers, seconded workers, volunteers, interns and agents; and
- b. our contractors, external consultants, agencies, third-party representatives, and business partners ("Suppliers").

The Trust is committed to: acting ethically and with integrity in all our business dealings and relationships; implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our operations including; and ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains consistent with obligations under the Modern Slavery Act 2015. The Trust will follow all government guidance as set out [here](#).

We expect the same high standards from all of our Suppliers. As part of our procurement processes, we have specific prohibitions against modern slavery – particularly the high-risk activities, and we expect that our Suppliers will hold their own suppliers to the same high standards.

Identifying Modern Slavery

There is no typical victim of modern slavery, and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking:

- a. The person is not in possession of their own passport, identification or travel documents.
- b. The person is acting as though they are being instructed or coached by someone else.
- c. The person allows others to speak for them when spoken to directly.
- d. The person is dropped off and collected from work.
- e. The person is withdrawn or appears frightened.
- f. The person does not seem to be able to contact friends or family freely.
- g. The person has limited social interaction or contact with people outside of their immediate environment.

The above list is not exhaustive. A person may display a number of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

Responsibility for this Policy and Compliance

The Board of Trustees has overall responsibility for ensuring this policy complies with the Trust's legal and ethical obligations. Which will be enacted through this policies and actions required overseen by the Trust CEO and senior management team, who will ensure that all workers of the trusts aid in, and act to ensure compliance.

Reporting Modern Slavery

Trust Staff and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:

- a) If you are a member of the Trust' Staff, your Line Manager; or
- b) If you are a Supplier, your primary contact within the Trust.
- c) Alternatively, you may report incidence or suspicions of modern slavery to Modern Slavery Helpline on 0800 0121 700. Further information is available here:
<https://www.antislavery.org/slavery-today/spot-the-signs-of-slavery/>

Goals and Key Performance Indicators

Goal	Progress –	KPI
Ensure modern slavery risks are being assessed in our supply chain	Annual supplier review and supply chain mapping in place. (last completed Jan 24). All current suppliers in high-risk activities deemed 'low-risk'	100% of suppliers in high-risk activities assessed
Enhanced modern slavery and awareness for employees	Modern slavery awareness added to induction procedures from 2024. Online supply chain mapping training completed by procurement staff (Jan 24)	100% of staff to receive instruction on modern slavery. In addition, 100% procurement staff to complete supply chain mapping online training.
Improve supplier awareness of YDRT policy	Sharing of policy added to Trust procurement processes.	100% of new suppliers in high-risk activities to be provided with policy.

Publication of This Policy

This policy is available to Trust Staff through the provision of the Staff Handbook. Ongoing training will be provided through Team Meetings and online training as necessary.

This policy will be available to Suppliers through Trust Procurement.

Breaches of This Policy

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

The relevant member of the Group may terminate its relationship with a Supplier if it is in breach this policy. Alternatively, the relevant member of the Group may elect to work with the Supplier to resolve such issues.

Policy Review

The Board of Trustees is responsible for reviewing this policy on an annual basis, or as is necessary to ensure that it meets legal and ethical requirements and reflects best practice.

This policy does not form part of any contract of employment and may be amended at any time.

Reviewed 23rd January 2024