



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

The Green House maintains relationships with many different organisations, as well as employing people directly. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, The Green House has adopted a statement on the prevention of modern slavery and human trafficking. The statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. We expect all who have, or seek to have, a business relationship with The Green House and/or any member of our company, to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with our anti-slavery policy.

1. Our statement

The Green House operates to a set of five values which reflect how we behave: Quality, Hope, Collaboration, Learning and Trust. With particular reference to the Modern Slavery Act 2015, these values, and our work with vulnerable people, often victims of sexual exploitation, ensure that we remain committed to opposing modern slavery and preventing it by whatever means we can. Our attitude to modern slavery is: zero tolerance.

2. Purpose of the policy

2.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out the policy of The Green House (the “Company”) with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

2.2 As a company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

3. Steps for prevention of slavery

3.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery. We expect our suppliers to hold their own suppliers to the same high standards.

3.2 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chain, we acknowledge that we do not control the conduct of individuals and organisations in our supply chain.

4. Responsibility for the policy

4.1 Ultimate responsibility for the prevention of modern slavery rests with the Charity's Board of Trustees. The Trustees have overall responsibility for ensuring compliance with our legal and ethical obligations.

4.2 However, Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate guidance on the issue of modern slavery.

5. Actions to report modern slavery or human trafficking

5.1 The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner.

5.2 The Whistleblowing Procedure applies to employees and may be found in the Employee Handbook available on the Company's intranet site. The nature of the complaint will determine the Company's next course of action.

6. Suspicious activity

6.1 The Charity, must be made aware immediately of any suspicious activity through reporting to the CEO.

Employees or any other person wishing to raise a concern should call the CEO in any of the following circumstances:-

- You suspect a person acting on behalf of The Green House is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of The Green House, who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;

- You have information which leads to the rational conclusion that a person acting on behalf of The Green House or a supplier is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

The source of reports will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery being committed.

7. Direct communication

The charity encourages members of the public or people not employed by us to write, in confidence to the CEO, to raise any concern, issue, or suspicion of modern slavery in any part of our business, or related supply chain.

8. Safeguards

We aim to 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 own business, or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

9. Review

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed on a regular basis and may be amended from time to time. This policy will be used to inform our Statement on Slavery and Human Trafficking.