

Modern Slavery and Human Trafficking Statement

March 2025

Spurgeons is fully committed to the principles of the Modern Slavery Act 2015 and to the eradication of modern slavery, human trafficking, forced labour, and all forms of exploitation and abuse. As a national children's charity working with some of the most vulnerable children, young people and families across England, we recognise our moral duty to take a proactive stance on protecting human rights in every part of our organisation and wider supply chain.

Although Spurgeons is not legally required to produce an annual Modern Slavery Statement—our turnover falls below the £36 million threshold—we believe it is good governance and ethical best practice to outline the steps we are taking to prevent and identify risks related to modern slavery in our operations, services, and partnerships.

Our Organisational Commitment

We have a **zero-tolerance approach** to modern slavery and human trafficking. We are committed to ensuring that our activities, and those of our suppliers and partners, are conducted in a way that upholds dignity, safeguards rights, and promotes transparency. This includes:

- **Acting ethically** and with integrity in all our contractual, operational, and procurement relationships.
- **Raising awareness** among staff and volunteers about modern slavery risks, especially within safeguarding and service delivery contexts.
- **Strengthening controls** across our HR and commissioning practices to eliminate risks of exploitation.

Governance and Oversight

Responsibility for this statement, and for the prevention of modern slavery across Spurgeons, rests with the **Board of Trustees**, which reviews this statement annually. Day-to-day responsibility for implementation lies with the **Deputy Chief Executive Officer**, supported by operational leaders, our Procurement Lead, and the Director of Services and Practice.

All managers are expected to uphold and promote anti-slavery principles and ensure relevant procedures are followed at a service and departmental level.

Key Policies Supporting Our Commitment

We have embedded a number of key policies and procedures that support the prevention of modern slavery. These include:

- **Safeguarding and Child Protection Procedures (April 2025)** – Emphasise vigilance around child trafficking, County Lines, and exploitation risk indicators.
- **Safer Recruitment Policy** – Ensures rigorous employment checks, identity verification, and DBS compliance across all roles.
- **Ethical Investment Policy** – Avoids any financial association with companies known to be linked to labour exploitation or unethical practices.
- **Procurement and Supply Chain Standards (under development)** – All new suppliers will be expected to sign up to Spurgeons' Code of Conduct and provide assurance that their operations and subcontractors are free from modern slavery.

We also uphold sector-wide codes of practice and expect the same from our commissioned or partner organisations.

Areas of Risk

We recognise that risk may exist in the following areas:

- **Third-party commissioned services**, especially where staffing is outsourced or involves lower-paid sectors.
- **Goods and services procured** through complex supply chains, especially uniforms, tech, stationery, and facilities management.
- **Working with families at risk of trafficking or exploitation**, especially unaccompanied minors or refugee families.

We are embedding due diligence mechanisms to identify and act upon any potential risk areas, including:

- Supplier risk assessments and pre-qualification questionnaires
- Contract clauses that require compliance with the Modern Slavery Act
- Routine audit spot checks for key suppliers

Programme of Continuous Improvement (2025–2030)

Spurgeons is actively developing a strengthened modern slavery prevention framework, including:

Action	Timeline
Introduce a Supplier Code of Conduct and contract clauses related to anti-slavery	By Q4 2025
Launch internal modern slavery awareness training for managers and frontline workers	Q3 2025
Update procurement policy to reflect due diligence expectations and risk mapping	Q1 2026
Embed anti-slavery checks into contract monitoring and audit frameworks	From 2026
Join sector forums or collaborations on ethical procurement and social value	2026–27
Publish standalone Modern Slavery Risk Assessment	By 2027

Reporting Concerns

Spurgeons encourages staff, volunteers, partners, and suppliers to raise any suspicions of modern slavery or unethical practices. Our **Whistleblowing Policy** and **Safeguarding Procedures** provide safe routes for escalation and ensure concerns are handled promptly and appropriately.

Approved by:

The Board of Trustees

Date: 8th March 2025

Next Review Due: March 2026