



# Pandora Project

## Modern Slavery 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, 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. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our charitable dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our charity.

This policy explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others, how we keep it safe and your rights and choices in relation to your information.

We are also committed to ensuring there is transparency in our charity and in our approach to tackling modern slavery and we expect the same high standards from all our partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our partners will hold the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, Trustees, agency workers, seconded workers, volunteers, external consultants, third-party representatives and working partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### Responsibility for the Policy

The Trustees have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The CEO has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

### Compliance with the Policy

All Pandora staff must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our charity is the responsibility of all those working for Pandora Project. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff must notify their line manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Staff are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our charity at the earliest possible stage.

If staff believe or suspect a breach of this policy has occurred or that it may occur, they must notify their line manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any part of our charity constitutes any of the various forms of modern slavery, they must raise it with their line manager.

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 charity. If you believe that you have suffered any such treatment, you should inform your line manager immediately.

## Communication and Awareness of Policy

Training on this policy, and on the risk our charity faces from modern slavery will be given where needed.

Our zero-tolerance approach to modern slavery must be communicated to all staff.

## Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy