



Modern Slavery Statement

Action for Children Structure and Supply chain

Action for Children is a UK registered charity. Its objectives are to promote the care, safety and upbringing of children and young people, and to help those in need by reason of age, ill health, disability, financial hardship, or any other disadvantage. The charity employs over 4,000 staff across the UK, who collaborate with volunteers to fulfil our mandate.

The procurement team oversees procurement of goods and services for Action for Children and its subsidiaries. Action for Children has a clearly defined Procurement Policy which outlines different tendering, due diligence and approval levels depending on the value of goods or services being procured, the nature of the supplier and the relative risks involved. Our supply chain provides goods and services relating to professional services, technology, fundraising and marketing, office, and premises.

Action for Children welcomes the Modern Slavery Act 2015 and the duty it places on large organisations, such as Action for Children, to comply with the Modern Slavery Act 2015 and publicly disclose the steps they are taking to prevent modern slavery within their respective organisations and in their supply chains. This Statement is made on behalf of Action for Children and all its subsidiaries.

Our Policies on Modern Slavery

Action for Children has a zero-tolerance approach to modern slavery. We are 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 own business, or in any of our supply chains (for contracts over the value of £10,000 which our Legal Department has oversight of).
- Ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

In addition to our Modern Slavery Policy, our wider policy framework address risks regarding Modern Slavery as follows:

- Safer Recruitment Policy - provides safe, consistent, robust recruitment processes and procedures with safeguarding considerations at its core. This ensures we maintain an overview of those entering our employment and prevents occurrence of forced and involuntary labour.
- Procurement Policy - this policy guides all our staff and address modern slavery risks that may occur in our supply chain. It reflects our commitment to act ethically and with integrity in all our business relationships.
- Code of Conduct Policy - our key staff ethical policy, and includes ethical behaviour, management of conflicts of interest, and the reporting of issues.
- Pay Policy - ensures that staff we employ receive fair pay.
- Bribery, Fraud and Corruption Policy - this sets out the AFC's stance on Fraud, Bribery and Corruption and its approach to preventing, detecting, reporting.
- Whistleblowing Policy - ensures that staff and contractors can raise concerns about potential poor practice or wrong-doing within the organisation, and the appropriate steps to take to raise these concerns.
- Safeguarding Policy - the sets our standards to be followed by staff and our partners for the protection of children, young people, vulnerable individuals and families from exploitation and abuse.
- Ethical Policy Framework - sets out ethical standards and common principles in which we approach all investments, procurement, funding, and other significant activities.
- Donor Acceptance Policy - enables the charity's trustees, senior management and fundraising team to make consistent and objective decisions regarding the acceptance or refusal of donations to Action for Children. It ensures that we have an informed decision making process for all donations/partnerships/opportunities that we consider to be high risk.

We expect the same high standards from all our staff, contractors, suppliers, and other business partners, and we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude – whether adults or children – as part of the due diligence on our contracting process.

Due Diligence process

Action for Children has a zero-tolerance approach to modern slavery. That includes forced or trafficked labour of adults and children. Our policies ensures that the necessary procedures and processes are in place across our operations to prevent any occurrence of modern slavery.

Action for Children has concluded that a key requirement for us when engaging with other suppliers is that they meet our ethical standards in accordance with our Ethical Policy Framework. To help

achieve this, potential suppliers must go through a new supplier onboarding process. This considers the appropriate due diligence in accordance with the level of risks and value of procurement. In this way, we ensure the potential for slavery and human trafficking is significantly reduced and make sure the companies we do business with that we are not prepared to accept any form of exploitation.

We expect our suppliers to hold their own suppliers to the same high standards. To achieve this, Action for Children has:

- Complied with anti-slavery and antihuman-trafficking legislation, by implementing processes, alongside reporting and prevention mechanisms.
- Included template clauses addressing this issue, to avoid breaches of the Modern Slavery Act by our suppliers. This is clearly written into our procurement documentation with reference to the Modern Slavery Act 2015.
- The implementation of modern slavery preventions within our Safeguarding Framework/organisational policies and the provision of training materials to staff on modern slavery and human trafficking.

These processes will maintain our proactive approach to the prevention of slavery in the UK.

Commitment to Continuous Improvement

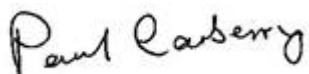
As a way of committing and working to prevent modern slavery, we have set out the below criteria as part of our continuous improvement and awareness strategy:

- We will update our Modern Slavery Statement on an annual basis as per governmental requirements and ensure that appropriate information, training, and reporting is updated wherever there are any changes
- We will ensure modern slavery is addressed, where appropriate, in all key policies and procedures across the charity
- We will ensure modern slavery continues to be addressed appropriately throughout the procurement process, by evaluating the processes by which all potential suppliers are evaluated in relation to modern slavery risk before they enter the supply chain
- Provide modern slavery training as a part of safeguarding awareness training to all employees. This will ensure that the employees are knowledgeable about the potential modern slavery and human trafficking risks when dealing with Action for Children service users and suppliers.

Identifying and reporting

All staff have responsibilities under the Modern Slavery Act and must keep up their awareness. If you suspect someone (whether a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, you should:

- You should contact 999 if you think someone is in immediate danger; or
- If a staff member believes the person does not appear to be in immediate danger, they should contact the safeguarding team who can advise further.



Chief Executive Officer

For and on behalf of Action for Children

Date: 20 September 2023