



Wrekin Old Hall Trust

Modern Slavery and Human Trafficking Policy & Statement

Date of approval: June 2025

Next review: June 2026

Owner: Chief Financial Officer

1. Introduction & Purpose

Wrekin Old Hall Trust ("the Trust") is firmly committed to ensuring that slavery and human trafficking are not present in any part of its operations or supply chains. This policy outlines our approach under the Modern Slavery Act 2015.

2. Scope

- Applies to all staff, trustees, volunteers, contractors and suppliers within the UK and overseas.
- Embraces all aspects of Trust operations including fundraising, historic properties, education, and maintenance services.

3. Our Commitment

- We expect every part of our organisation and our suppliers to uphold high ethical standards.
- We actively assess and mitigate risk, paying close attention to areas that involve:
 - International suppliers, particularly from high-risk regions
 - Service contracts such as cleaning, catering, property maintenance
 - Personnel agency usage and third-party labour supply

4. Due Diligence & Risk Management

- We maintain a risk register and regularly review it in light of new insights and sector guidance.

- For suppliers exceeding £50,000 in annual turnover or identified risk level, we will:
 - Conduct an annual modern slavery compliance questionnaire
 - Require declaration of no convictions under Sections 2 or 4 of the Act
 - Include anti-slavery clauses in standard contracts

5. Training & Awareness

- All new staff and volunteers receive induction training on modern slavery awareness.
- Annual refresher briefings are provided for staff in key roles (e.g., procurement, site managers).
- A clear, confidential reporting route exists for concerns via the Trust's whistle-blowing policy.

6. Monitoring & Reporting

- Key performance indicators, such as supplier questionnaire completion rates and identified risks, are reviewed annually by the Finance Committee (or equivalent).
- Any concerns are investigated promptly, with corrective action taken—including potential contract termination—where warranted.

7. Key Performance Indicators (KPIs)

- All relevant suppliers (≥£50k turnover) to return compliance questionnaires by Q2 each financial year.
- 100 % of first-tier suppliers to have anti-modern slavery clauses in place.
- No known incidents of modern slavery reported within our operations or supply chains.

8. Governance & Oversight

- The Board of Governors approved this policy in June 2025.
- Oversight is provided by the Finance Committee, which receives bi-annual updates and conducts a full review each June.

9. Next Steps & Continuous Improvement

During the 2025–26 year, the Trust will:

- Evaluate the effectiveness of supplier questionnaires and contract clauses
- Enhance due diligence in risk-prioritised supply categories (e.g. international sourcing, cleaning services)
- Investigate pathways for supporting suppliers in improving labour practices