



Modern Slavery and Human Trafficking Policy

Wings recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking. As a charity, an equal-opportunities employer, and education provider, Wings is committed to creating and ensuring a non-discriminatory and respectful working environment for all its staff and service users.

Wings' policies and manuals

Wings operates the following policies and manuals that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Wings' recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the United Kingdom and to safeguard employees and service users from any abuse, coercion or exploitation.

The following policies/documents are accessible to all staff:

Modern Slavery and Human Trafficking Standard

The Modern Slavery and Human Trafficking Standard sets out the minimum acceptable levels of behaviour required of all staff, sessional workers and volunteers as well as setting out the activities that will be undertaken to identify and address the risk of modern slavery within Wings' activities.

Wings Whistleblowing Policy

The Wings Whistleblowing Policy is communicated to employees during their induction. The intention of the policy is to outline the process for employees to report instances of corruption, malpractice, criminal behaviour and failure to deliver proper standards of service, where confidentiality is required. This policy is integral in preventing occurrences of modern slavery and human trafficking by providing an avenue whereby any suspected instance can be reported without fear of repercussions.

Whistleblowing opportunities are always available to employees, sessional workers and volunteers.

Contract

The employment, or similar, contract establishes conditions, processes, protocols, rights and responsibilities governing the employment of all employees. This extends to equal opportunities, pay, working hours, training and development, conduct and discipline and employee relations. This forms part of the contract of employment between Wings and its employees. The establishment of regulated working practices alongside standards to be upheld ensures the just and fair treatment of all employees.

Professionalism - Standards and Expectations

Wings makes it clear to employees the actions and behaviours expected of them when representing the organisation. This includes, but is not limited to, competence, reporting, personal responsibility,

procedural use and adherence to, and equality, diversity and inclusion. Upholding these standards within the workplace is essential in ensuring the correct treatment of employees and service users as well as the employees themselves maintaining the highest standards of conduct and ethical behaviour.

Equal Opportunities Policy

The Equal Opportunities policy documents Wings' commitment to providing equal opportunity for employment, advancement and equitable treatment, whilst outlining the responsibilities of employees and their managers to avoid and report instances of harassment. Wings' commitment to overcoming any barriers to equal opportunity and complying with its obligations is emphasised and this helps to ensure the fair and equitable treatment of all employees by providing a consistent approach to developing the skills and attributes of all employees whilst valuing their respective abilities.

Dignity at Work

Ensuring dignity at work covers harassment of, and by, all workers and service users engaged to: this includes Wings employees, sessional workers, volunteers service users, contractors, agency workers or anyone working in any other capacity on behalf of Wings. This approach provides recourse to the disciplinary procedure where an instance of harassment or other occurrence of indecent treatment of an employee occurs. Moreover, there is an expectation on employees to intervene in instances of harassment, if they feel able to do so, or at the very least report it immediately to a manager.

Ensuring dignity at work has the effect of reducing, or curtailing, any forms of inhuman or degrading treatment in the workplace, not only by those employed but also any person onsite and is therefore also compliant with Articles 3 and 4 of the European Convention on Human Rights.

Risk to Wings

The Ukrainian hub has been identified as one area of work that could be targeted by those wishing to abuse people in modern slavery. One of the purposes of the hub is to safeguard this vulnerable group. The nature of the Wings College, Academy and the Unity groups also attracts vulnerable service users, who may be at risk of harm through modern slavery.

Effective action taken to address modern slavery

Wings will undertake the following activities to address modern slavery risks:

- Development and roll out of ethics training to key staff in the organisation is key in drawing particular attention to positive action in terms of a strong reporting culture and encouraging the use of the whistleblowing facility
- Address whether there are modern slavery risks during discussions with outside agencies prior to any contract being drawn up.
- Continue to promote staff awareness of the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of slavery or human trafficking.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Wings' slavery and human trafficking statement.