

Modern Slavery & Human Trafficking Policy

Document title: Modern Slavery & Human Trafficking Policy and Statement

Organisation: Think&Do London

Approved by: Directors of Think&Do London

Date approved: 26/01/2026

Review date: 26/02/2027

Policy owner: Head of Projects

Contact for concerns: info@thinkanddocamden.org.uk

Related policies: Safeguarding Policy, Equality & Diversity, Health & Safety

1. Purpose

Think&Do is committed to preventing modern slavery and human trafficking in our organisation and in the goods and services we buy. We recognise that exploitation can occur in any sector, including those connected to community activity, events, venues, facilities, and supply chains.

This policy sets out how we:

- reduce the risk of modern slavery in our operations and purchasing
- expect suppliers and partners to meet basic labour standards
- enable concerns to be raised safely and acted upon

2. Who this policy applies to

This policy applies to:

- anyone working for or representing Think&Do (staff, contractors, volunteers, sessional workers)
- suppliers and service providers we buy from or work with
- delivery partners working with us on Think&Do activity

3. What we mean by “modern slavery”

Modern slavery is a serious crime and human rights abuse. It includes (but is not limited to) **slavery, servitude, forced or compulsory labour, and human trafficking**, where a person is exploited and their freedom is controlled or taken away.

4. Our commitment

Think&Do will:

- act ethically and with integrity in how we operate and procure

- take a proportionate, risk-based approach to due diligence
- respond promptly and appropriately to concerns raised
- work to improve our practices year-on-year, in line with recognised UK guidance on transparency and continuous improvement

We have zero tolerance for modern slavery and human trafficking.

5. Our activities and where risk could arise

Think&Do is a resident-led movement and community programme tackling social and climate injustice, involving projects, volunteering and community activity.

We recognise that modern slavery risk may be higher where there are:

- contracted services (cleaning, security, catering, waste, maintenance)
- short-notice, low-cost labour
- complex subcontracting
- goods at risk of forced labour in global supply chains (e.g., some textiles, electronics, promotional materials)

6. Governance and responsibilities

The Directors will:

- approve this policy and review it annually
- receive significant incidents/concerns and ensure appropriate action

The Head of Projects will:

- implement and maintain this policy
- ensure appropriate supplier checks and contract wording
- keep a basic record of suppliers and risk checks undertaken

All staff/volunteers/representatives will:

- be alert to indicators of exploitation
- raise concerns promptly using the reporting routes in section 10
- avoid procurement practices that prioritise lowest cost over basic labour safeguards

7. Safe recruitment and fair working practices

Think&Do will take proportionate steps to ensure:

- recruitment is fair, transparent and lawful
- no worker is charged fees to obtain work related to Think&Do
- identity/right-to-work checks are completed where relevant and lawful

- pay and conditions meet legal requirements for any paid roles
- volunteer roles are clearly described and not used to replace paid labour unlawfully

8. Procurement and supplier due diligence

Think&Do will take a proportionate approach based on what we buy and the level of risk.

For all suppliers:

- we will prefer reputable suppliers with clear employment practices
- we will keep basic records of who we buy from and what they provide
- we will include expectations on lawful and ethical labour practices in agreements where practical

For higher-risk categories:

Examples: cleaning, security, labour agencies, construction/refurbishment, large print runs, uniforms/merchandise, and certain imported goods.

- we will ask suppliers to confirm they comply with labour laws and do not use forced labour
- where feasible, we will request relevant policies (e.g., modern slavery statement, ethical sourcing)
- we may include contract clauses allowing termination for serious breaches

This aligns with common charity practice of using procurement controls, supplier codes/ethical expectations, and regular review.

9. Working with partners

When working with partner organisations, Think&Do will:

- communicate our zero-tolerance position
- prefer partners with compatible safeguarding/ethical standards
- raise concerns if we identify credible risk indicators

10. Reporting concerns

Anyone can report a concern if they suspect:

- a person is being exploited
- unsafe, coercive, or deceptive working conditions
- identity documents being withheld
- threats, intimidation, restriction of movement, or debt bondage indicators

Concerns should be reported to: the Head of Projects (info@thinkanddocamden.org.uk)

If the concern involves immediate danger, contact emergency services.

We will treat reports seriously, act sensitively, and protect confidentiality where possible. We will not tolerate retaliation against anyone who raises a concern in good faith (including volunteers).

11. Training and awareness

Think&Do will provide proportionate awareness for relevant staff/volunteers, for example:

- a short annual briefing on recognising and reporting concerns
- basic guidance for anyone involved in buying goods/services or appointing contractors

12. Monitoring, transparency, and review

We will:

- review this policy at least annually
 - record any concerns raised and actions taken (in a secure, appropriate way)
 - update our public statement on our website as our activities and supply chains change
-