

Modern Slavery Statement

Introduction

This statement sets out Via's actions to understand all potential modern slavery risks related to our organisation and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our organisation and our supply chains. This statement relates to actions and activities during the financial year 2023-2024.

As part of our sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Via as a substance misuse charity who operates in England.

We follow a risk assessment process by which we assess whether or not particular activities are high risk in relation to slavery or human trafficking. As a result of this review, we do not have activities that are at high risk of slavery or human trafficking:

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** Our policies go through a formal consultation and ratification process
- **Risk assessments:** All activities are risk assessed and currently monitored for risk
- **Investigations/due diligence:** Directors are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking, if anything should be suspected it will be escalated to the Chief Operating Officer and/or the Chief Executive Officer
- **Training:** Training takes place in accordance with Via's Learning & Development offer with the aim of better understanding and responding to the identified slavery and human trafficking risks.

Relevant policies

We operate policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. We have in place:

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact named individuals. We also operate a 24/7 Employee Assistance Programme.
- **Employee codes of conduct** Our codes make clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating both at home and abroad and managing its supply chain.
- **Supplier/Procurement code of conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of any business relationship.
- **Recruitment/Agency workers policy** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

We undertake due diligence when considering new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through our own staff/third party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating a risk profile for each supplier;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular ethical trading initiatives;

- ensuring suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all staff to complete training on modern slavery ;
- developing a system for supply chain verification whereby we evaluate potential suppliers before they enter the supply chain; and
- reviewing our existing supply chains whereby we evaluate all existing suppliers.

Training

We require all staff within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by articles in our internal newsletter explaining:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;

- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

This statement is approved by Via's Chief Operating Officer and Director of People