



Modern slavery statement

Introduction

This statement applies to all companies within and associated to Via Community Ltd and Via Residential Ltd (referred to in this statement as 'Via'). The information included in the statement refers to the financial year 2026-2027.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps Via has taken, and continues to take, to prevent modern slavery and human trafficking within our organisation and throughout our supply chains.

Via recognises that modern slavery is a serious crime and a violation of fundamental human rights. We are committed to acting ethically, with integrity and transparency in all business dealings and relationships and to implementing effective systems and controls to safeguard against any form of modern slavery occurring within our organisation or supply chains.

Our Organisation

Via Community Ltd (Company No. 02807934, Charity No. 1031602) and Via Residential Ltd (Company No. 03197716, Charity No. 1055486) work together to deliver a range of drug, alcohol, sexual health and smoking cessation services that support individuals, families and communities across England. The organisations share governance arrangements and operate within a common supply chain.

Both organisations are charitable companies limited by guarantee and are governed by a Board of Trustees, who are responsible for ensuring effective oversight, strategic direction, and compliance with legal and regulatory obligations. The Trustees are committed to maintaining high standards of governance and ethical practice across all areas of operation, including the prevention of modern slavery and human trafficking.

The registered office for both organisations is Passmores House, Third Avenue, Harlow, Essex, CM18 6YL.

Via is committed to acting with integrity in all business relationships and to implementing effective systems and controls to safeguard against modern slavery and human trafficking within our organisations and throughout our supply chains.

The labour supplied to Via in pursuance of our operations is carried out across several counties within England.

Definitions

Via considers modern slavery to encompass:

- Human trafficking.
- Forced work through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse or threat of abuse.
- Being dehumanised, treated as a commodity, or bought and sold as property.
- Being physically constrained or having restrictions placed on freedom of movement.
- Debt bondage, forced labour, servitude and other forms of exploitation.

Our Commitment

Via acknowledges its responsibilities in relation to tackling modern slavery and commits to complying fully with the provisions of the Modern Slavery Act 2015.

We understand that addressing modern slavery requires continual vigilance, review and improvement of both our employment practices and our supply chain arrangements.

We will not knowingly enter into business with any organisation, whether in the United Kingdom or overseas, that supports, facilitates or is found to be involved in slavery, servitude, forced labour or human trafficking.

No labour provided to Via in the delivery of our services is knowingly obtained through slavery, servitude, compulsory labour or human trafficking. We are committed to ensuring fair treatment, dignity, equality and respect for everyone who works for or with us.

We adhere to all applicable UK employment legislation and, in many areas, seek to exceed minimum legal standards through our policies, procedures and culture.

We maintain a zero-tolerance approach to modern slavery of any kind.

Our Supply Chains

To deliver our services effectively, Via procures goods and services from a range of suppliers and partners.

Our principal supply chains include:

- Temporary and agency staffing providers.

- Facilities management and property services.
- Information technology and telecommunications.
- Professional and consultancy services.
- Clinical and operational supplies.
- Office consumables and equipment.
- Training and development providers.

We recognise that some suppliers may have their own complex supply chains involving subcontractors and lower-tier suppliers. We therefore expect all suppliers and partners to share our commitment to preventing modern slavery and maintaining ethical employment practices.

Policies Supporting Our Approach

Via has implemented a range of policies and procedures that support our commitment to preventing modern slavery.

These include:

- Modern Slavery Policy.
- Procurement Policy.
- Safeguarding Adults Policy.
- Safeguarding Children and Young People Policy.
- Recruitment Policy.
- Whistleblowing Policy.
- Code of Conduct.
- Diversity, Equity and Inclusion Policy.
- Complaints and Feedback Procedures.
- ACAS compliant Disciplinary and Grievance Procedures.

These policies provide guidance to employees, managers, volunteers and contractors and support the identification, reporting and prevention of exploitation.

Assessing and Managing Risk

We recognise that modern slavery risks can exist in every sector and organisation.

As a provider of health and social care services, sexual health and smoking cessation services, we assess our primary areas of potential risk as including our recruitment and employment processes involving temporary and agency workers, suppliers and procurement of goods potentially manufactured overseas and any contracted services involving subcontracting.

At present, we consider the overall risk of modern slavery within our direct operations to be relatively low. However, we acknowledge that risks remain and we are committed to ongoing monitoring, assessment and mitigation.

Risk assessments are undertaken through our procurement, safeguarding, governance and operational processes.

Due Diligence

Via undertakes due diligence measures designed to minimise the risk of modern slavery occurring within our organisation or supply chains.

These measures include:

- Assessing suppliers during procurement processes.
- Reviewing supplier policies and ethical standards where appropriate.
- Incorporating compliance requirements into procurement and contract management processes.
- Considering modern slavery risks when engaging new suppliers and contractors.
- Maintaining safeguarding procedures that support the identification of potential victims of exploitation.
- Investigating concerns raised through safeguarding, whistleblowing or incident-reporting processes

We expect suppliers and contractors to comply with all relevant legislation relating to employment rights, human rights and modern slavery.

Safeguarding and Service Delivery

As an organisation working directly with at risk individuals and communities, safeguarding forms a critical part of our response to modern slavery.

Through our services, staff may come into contact with individuals who are experiencing or at risk of exploitation, trafficking, coercion or abuse.

We support staff to:

- Recognise indicators of exploitation and trafficking.
- Escalate concerns appropriately.
- Make safeguarding referrals when required.
- Work in partnership with statutory agencies and safeguarding boards.
- Promote the safety, dignity and wellbeing of all staff and the people we support.

Training and Awareness

Via provides mandatory Modern Slavery and Safeguarding training to staff and ensures that employees understand:

- What modern slavery is.
- The indicators and warning signs of exploitation.
- Reporting and escalation procedures.
- Their responsibilities under Via policies.
- Via's zero-tolerance approach to modern slavery.

Additional safeguarding and compliance training is provided where appropriate based on role and responsibilities.

We will continue to review training provision to ensure that awareness remains current and effective.

Monitoring and Evaluation

Via monitors the effectiveness of its approach to modern slavery through governance and assurance mechanisms.

The Safeguarding Committee, Finance & Resources Committee and the Board of Trustees have oversight of safeguarding, compliance, procurement and organisational risk. The Integrated Governance Group receives information that supports oversight of safeguarding, compliance and organisational risk.

Measures used to assess effectiveness include:

- Safeguarding concerns reported and managed.
- Actions identified through governance processes and quality improvement activity.
- Compliance audits and policy reviews.
- Risk assessments undertaken and reviewed
- Staff completion rates for mandatory training.
- Procurement and supplier assurance activities.
- Whistleblowing reports received.

These measures help us understand where improvements may be required and support continuous development of our approach.

Actions Taken and Future Commitments

Via has not, to our knowledge, conducted business with any organisation found to be involved in modern slavery.

To help ensure modern slavery is not taking place within our organisation or supply chains, we have:

- Maintained a Modern Slavery Policy and Safeguarding Policies and Procedures.
- Continued mandatory safeguarding and modern slavery training.
- Embedded a zero-tolerance approach to modern slavery across the organisation.
- Maintained recruitment processes designed to verify eligibility to work and protect workers from exploitation.
- Continued supplier and procurement review processes.
- Promoted reporting mechanisms for concerns relating to exploitation and human trafficking.
- Maintained governance oversight through our organisational committees and the Central Integrated Governance Committee.

Over the coming year we will continue to:

- Improve staff awareness and reporting confidence.
- Review and update relevant policies and procedures.
- Continue embedding modern slavery considerations into safeguarding and risk-management activities.
- Review procurement documentation and contractual clauses relating to modern slavery.
- Strengthen supplier assurance processes.
- Monitor emerging risks within our operations and supply chains.

Modern Slavery Compliance Officers

Via has a Safeguarding Lead to oversee compliance with this statement and related obligation in relation to direct service delivery and a Chief Operating Officer who fulfils the same function in relation to procurement and supply chains.

Any issues regarding modern slavery, human trafficking or exploitation should be reported immediately to one of the following:

- Heads of Services in relation to procuring goods and services
- Safeguarding Leads within our Services, or escalated to our National Safeguarding Lead, in relation to people accessing our services
- To any other member of the Executive Leadership Team



Doing so will ensure appropriate action is taken and, where necessary, concerns are escalated through safeguarding, governance or legal processes.

Approval

This statement has been approved by the Chief Executive Officer of Via and will be reviewed annually.