

# Anti Slavery Policy

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Original Policy by **Bindesh Majithia**  
Drafted by **Bindesh Majithia**

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## Contents

|                                                        |   |
|--------------------------------------------------------|---|
| Introduction.....                                      | 2 |
| Purpose.....                                           | 2 |
| Scope.....                                             | 2 |
| Legal Framework.....                                   | 2 |
| Associated Policies .....                              | 3 |
| Responsibilities .....                                 | 3 |
| Trustees.....                                          | 3 |
| Directors .....                                        | 4 |
| Managers .....                                         | 4 |
| Employees and Volunteers .....                         | 4 |
| Prevention, Due Diligence and Reporting Concerns ..... | 4 |
| Indicators of Modern Slavery .....                     | 4 |
| Review .....                                           | 4 |

# US Anti Slavery Policy

## Introduction

The United Synagogue is committed to acting ethically, with integrity and transparency, and to taking reasonable and proportionate steps to prevent slavery, servitude, forced or compulsory labour, and human trafficking in its operations and supply chains. Guided by Torah values and the principle of *kavod habriyot* (human dignity), the Charity will not tolerate exploitation in any form.

This policy supports the Charity's safeguarding, employment, procurement and governance arrangements. It sets out the standards expected of employees, trustees, volunteers, contractors, consultants, agency workers and suppliers, provides a framework for identifying, preventing, reporting and responding to concerns, and supports compliance with the [Modern Slavery Act 2015](#) and any annual modern slavery statement published by the Charity where required or appropriate.

## Purpose

The purpose of this policy is to set out the Charity's zero-tolerance approach to modern slavery and human trafficking and to establish clear responsibilities for prevention, due diligence, reporting, and escalation. It also aims to promote lawful, fair and ethical recruitment, employment and procurement practices across the Charity's activities.

In addition, this policy is intended to support the identification and management of modern slavery risks within the Charity's activities and supply chains, and to ensure that any concerns are responded to promptly, sensitively and appropriately, with due regard to safeguarding and the welfare of any affected individual.

## Scope

This policy applies across the Charity to all employees, workers, agency and casual workers, volunteers, honorary officers, trustees, consultants, contractors, and anyone else working on its behalf.

It also applies to third parties the Charity works with, including suppliers, service providers, recruiters, subcontractors, relevant grant-funded delivery partners, and organisations operating on the Charity's premises or in connection with its activities.

The policy covers modern slavery risks in the UK and overseas, whether arising directly in the Charity's operations or indirectly through labour providers, outsourced services, facilities management, cleaning, catering, maintenance, construction, technology, logistics, uniforms, merchandise, or other goods and services it purchases.

## Legal Framework

This policy is informed by, and should be read in the context of, relevant UK legislation and guidance, including where applicable:

- [Modern Slavery Act 2015](#)
- [Employment Rights Act 1996](#)

- [Public Interest Disclosure Act 1998](#)
- [Equality Act 2010](#)
- [Data Protection Act 2018](#)
- [Procurement Act 2023](#)
- [UK General Data Protection Regulation \(UK GDPR\)](#)
- [Charity Commission safeguarding guidance for charities and trustees](#)
- [Home Office guidance on transparency in supply chains.](#)

## Associated Policies

This policy should be read and applied alongside the United Synagogue's other relevant policies and procedures, including where applicable:

- [Safeguarding Children Policy](#)
- [Safeguarding Adults at Risk Policy](#)
- [Whistleblowing Policy](#)
- [Disciplinary Policy and Procedure](#)
- [Code of Conduct](#)
- [Equality and Diversity Policy](#)
- [Data Retention Policy](#)
- [Health and Safety Policy](#)

## Statement of Principle

The United Synagogue adopts a zero-tolerance approach to modern slavery and human trafficking and will not knowingly engage in, support or benefit from slavery, servitude, forced or compulsory labour, or human trafficking.

The Charity is committed to maintaining proportionate systems and controls to reduce the risk of exploitation in its operations and, so far as reasonably practicable, its supply chains. This includes appropriate recruitment checks, fair treatment of workers, responsible procurement, contractual controls, risk-based due diligence, staff awareness, and effective routes for speaking up.

Where indicators of modern slavery are identified, the Charity will take them seriously and respond promptly, lawfully, proportionately and in a victim-centred way. Ending a supplier relationship will not automatically be the first response; the Charity will consider safeguarding, legal duties, the risk of further harm, and whether remediation or referral to the appropriate authorities is required.

Where applicable, the Charity will publish an annual Modern Slavery and Human Trafficking Statement in accordance with Section 54 of the Modern Slavery Act 2015, approved by the Trustees and published on its website.

## Responsibilities

### Trustees

The Trustees have overall responsibility for ensuring that the Charity maintains an effective framework to prevent modern slavery and that appropriate resources, oversight and challenge are in place.

## Directors

Senior leaders are responsible for embedding this policy, promoting an open culture in which concerns can be raised, and ensuring that relevant risks are considered as part of governance, safeguarding, recruitment and procurement activity.

## Managers

Managers must remain alert to indicators of exploitation, ensure that staff understand reporting routes, and escalate concerns without delay. HR, safeguarding leads, procurement staff and contract managers must apply this policy within their areas of responsibility, including during recruitment, onboarding, supplier selection, contract management and incident handling.

## Employees and Volunteers

All employees, workers, volunteers and others covered by this policy are expected to comply with it, to complete any required training, and to report concerns promptly if they know or suspect that modern slavery may be occurring or may be at risk of occurring.

## Prevention, Due Diligence and Reporting Concerns

The Charity will take reasonable and proportionate steps to prevent and identify modern slavery risks. These may include risk-based supplier onboarding and review, tender and questionnaire requirements, contractual anti-slavery compliance clauses, scrutiny of labour providers and higher-risk services, contract monitoring, and training or guidance for relevant staff.

The Charity expects suppliers and contractors to use lawful employment practices, avoid arrangements that could place workers in exploitative conditions, maintain appropriate policies and controls, and raise concerns identified in their own operations or supply chains.

Anyone who knows or suspects that modern slavery may be taking place in connection with the Charity should report it immediately to their line manager, HR, the safeguarding lead, the relevant senior manager, or through the Charity's whistleblowing arrangements, as appropriate. Concerns will be taken seriously. The Charity will consider whether safeguarding action, support for the individual, referral to external agencies or law enforcement, and/or action in relation to a supplier or worker is required. Records of concerns and actions taken must be kept appropriately and in line with data protection requirements.

## Indicators of Modern Slavery

Possible indicators of modern slavery may include, for example: workers appearing fearful, withdrawn or unable to speak freely; signs of coercion, threats or restricted movement; a lack of personal identification documents; unusual deductions from pay; accommodation or transport controlled by others; excessive working hours; dependence on a third party for wages or communication; or concerns relating to debt bondage, trafficking or exploitative recruitment practices. These indicators do not prove exploitation, but they should prompt further enquiry and immediate escalation through the reporting routes set out in this policy.

## Review

This policy will be reviewed every two years to ensure it remains appropriate, valid, and compliant with current laws and best practice.