

GOVERNANCE & POLICIES



POLICY

Anti-Slavery and Human Trafficking Policy

Adopted by the Board of Directors

25th May 2026

KENT WITH UKRAINE LTD

www.kentwithukraine.co.uk

Anti-Slavery and Human Trafficking Policy

This policy was formally approved by Kent With Ukraine's Board of Directors on 25th May 2026 and this policy will be reviewed annually.

1. Policy Statement

Kent With Ukraine is committed to preventing modern slavery, human trafficking, forced labour, exploitation and abuse in all areas of its work.

As a UK-based NGO working with communities, volunteers, donors, partners and beneficiaries in the United Kingdom and Ukraine, Kent With Ukraine recognises that people affected by war, displacement, poverty, trauma, injury or loss may be at increased risk of exploitation.

Kent With Ukraine has a zero-tolerance approach to modern slavery and human trafficking. We expect the same standard from our directors, staff, volunteers, contractors, suppliers, delivery partners and representatives.

Although Kent With Ukraine may not be legally required to publish an annual modern slavery statement under section 54 of the Modern Slavery Act 2015 unless it meets the statutory commercial threshold, the organisation will voluntarily maintain clear policies and procedures to prevent, identify and respond to modern slavery risks. UK Government guidance requires qualifying organisations to publish a statement setting out steps taken to prevent slavery and human trafficking in their operations and supply chains.

2. Purpose

This policy sets out Kent With Ukraine's approach to:

- preventing modern slavery and human trafficking;
- reducing exploitation risks in humanitarian and overseas work;
- promoting ethical partnerships and procurement;
- protecting vulnerable people;
- ensuring concerns are reported and acted upon.

3. Scope

This policy applies to:

- Directors;
- staff and volunteers;
- advisers, consultants and secondees;
- delivery partners;
- suppliers and contractors;
- fundraising partners;
- anyone acting on behalf of Kent With Ukraine.

It applies to all activity in the UK, Ukraine and any other country where Kent With Ukraine operates or has partner activity.

4. Modern Slavery Risks

Modern slavery may include:

- forced labour;
- bonded labour or debt bondage;
- human trafficking;
- sexual exploitation;
- criminal exploitation;

- domestic servitude;
- forced recruitment;
- child exploitation;
- withholding identity documents;
- coercion, threats or abuse of vulnerability.

Kent With Ukraine recognises that heightened risks may arise where people are affected by war, displacement, migration, disability, injury, poverty, unemployment, trauma, family separation or lack of access to services.

Particular care will be taken when working with displaced people, veterans, injured persons, children, families, volunteers, drivers, suppliers, interpreters, logistics providers and local delivery partners.

5. Our Commitments

Kent With Ukraine will:

- act lawfully, ethically and with integrity in all operations;
- avoid working with organisations or individuals knowingly involved in exploitation;
- carry out proportionate checks on suppliers, contractors and delivery partners;
- ensure volunteers and representatives understand safeguarding and exploitation risks;
- ensure aid, transport, accommodation, support or access are never exchanged for labour, services, sexual activity, political support or personal benefit;
- protect beneficiaries from coercion, intimidation, manipulation or dependency;
- take modern slavery risks into account when planning projects in Ukraine;
- report credible concerns to appropriate authorities, safeguarding bodies, funders or law enforcement where necessary;
- keep records of concerns, actions and decisions;
- review this policy at least annually.

6. Suppliers, Contractors and Partners

Kent With Ukraine expects suppliers, contractors and partners to operate ethically and comply with all applicable labour, safeguarding and anti-slavery laws.

Where appropriate, Kent With Ukraine may require partners or suppliers to confirm that they:

- do not use forced, bonded or trafficked labour;
- do not exploit children or vulnerable adults;
- pay workers lawfully and fairly;
- do not withhold identity documents;
- provide safe working conditions;
- comply with relevant employment and labour laws;
- report any modern slavery concerns connected to Kent With Ukraine activity.

Kent With Ukraine may end a relationship with any supplier, contractor or partner where there is evidence of modern slavery, trafficking, exploitation or serious failure to address credible concerns. Where evidence of modern slavery, trafficking, exploitation exists we shall report to both British and Ukrainian law enforcement agencies.

7. Volunteers and Representatives

All volunteers and representatives must:

- treat all people with dignity and respect;
- report any concern about exploitation, trafficking or coercion;
- never misuse their position, access or authority;
- never ask beneficiaries or vulnerable people to provide labour, services, favours or personal benefits in exchange for assistance;
- never participate in, facilitate or ignore exploitative conduct;
- follow Kent With Ukraine's Code of Conduct, safeguarding, volunteer and whistleblowing procedures.

Any breach of this policy may result in removal from Kent With Ukraine activity and referral to the relevant authorities.

8. Operating in Ukraine

Kent With Ukraine recognises that war creates increased risks of exploitation, especially for displaced people, children, injured persons, veterans, widows, families without income, people with disabilities and those seeking transport, shelter, aid, employment or medical support. In Ukraine, Kent With Ukraine will:

- work through trusted partners wherever possible;
- avoid creating dependency or unsafe power dynamics;
- ensure beneficiary participation is voluntary;
- avoid informal labour arrangements connected to aid delivery;
- ensure drivers, interpreters, volunteers and local partners understand anti-exploitation expectations;
- take extra care with children, displaced families and vulnerable adults;
- escalate concerns promptly through safeguarding and reporting channels.

9. Reporting Concerns

Anyone who suspects modern slavery, trafficking, forced labour or exploitation connected to Kent With Ukraine's work must report it immediately to:

Designated Safeguarding Lead: Director, Mrs Iris Smith [e-mail]

Governance Lead: Head of Mission, Jordan Meade [e-mail]

Where there is immediate danger, the concern should be reported to emergency services or relevant local authorities.

Kent With Ukraine will not tolerate retaliation against anyone who raises a genuine concern in good faith.

10. Training and Awareness

Kent With Ukraine will provide proportionate guidance to directors, staff, volunteers and project participants on:

- recognising signs of modern slavery and trafficking;
- safeguarding vulnerable people;
- ethical conduct in humanitarian work;
- reporting concerns;
- risks associated with overseas delivery and conflict-affected settings.

11. Review and Accountability

The Board of Directors is responsible for oversight of this policy.

This policy will be reviewed annually and updated where required by law, funder expectations, operational learning or changes in Kent With Ukraine's work.

Kent With Ukraine will maintain records of concerns, risk assessments, partner due diligence and actions taken in response to modern slavery risks.