



Modern Slavery Statement

(Financial Year End: March 2025)

1. Introduction

New Europeans Association Ltd is a registered charity.

We believe every EU citizen in the UK should be aware of their rights and be able to play a full and active part in their community. Our mission is to provide information, advice, training and education to individuals, organisation and communities.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that FCDC has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. It covers all of the charity's activities and services.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. FCDC has a zero tolerance approach to any form of modern slavery.

We are committed to acting ethically and with integrity and transparency in all our business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

2. Structure and Supply Chains

New Europeans Association Ltd has 9 Trustees, 10 employees and 5 regular volunteers. Our employees are largely directly employed and are not in any category which is generally seen to be vulnerable to modern slavery in the UK. In line with our safeguarding policies and safer recruitment policy, we conduct thorough background checks on all employees and volunteers, including Disclosure and Barring Service (DBS) and right to work checks, to ensure that no one engaged by our organisation is involved in modern slavery or human trafficking.

The charity uses a wide range of suppliers who supply goods and services that support the operations of the charity. The charity recognises the importance of its role in implementing the guidance of the Modern Slavery Act and the consequences of its implications.

We have a strong focus on ensuring there are policies and procedures in place for our contractors and service providers with regards to modern slavery.

3. Our Policies and Procedures on Modern Slavery

Good practice policies and procedures are in place at the charity to ensure all Trustees, staff and volunteers are able to identify the signs of modern slavery and respond appropriately to any safeguarding concerns as well as to minimise the risk of modern slavery in our supply chain.

These policies and procedures include (but not limited to):

- [Safeguarding Adults Policy and Procedures](#)
- [Safeguarding Children and Young People Policy and Procedures](#)

Our safeguarding policies include detailed guidance on recognising potential signs of modern slavery and on identifying those who may be showing signs that they are affected by modern slavery, including:

- Showing signs of injury, abuse and malnourishment.
- They look unkempt, are often in the same clothing and have poor hygiene.
- Appearing to be under the control and influence of others.
- Living in cramped, dirty, overcrowded accommodation.
- They have no access or control of their passport or identity documents.
- Appearing scared, avoiding eye contact, and being untrusting.
- They may allow others to speak for them when addressed directly, rather than speak for themselves.
- They're collected very early and/or returned late at night on a regular basis.
- May have inappropriate clothing for the work they are performing, and/or a lack of safety equipment.
- May be isolated from the local community and their family.
- They travel only with other workers

Our safeguarding policies also provide detailed guidance on the actions required by Trustees, staff and volunteers to safeguard such individuals, including escalation to the relevant authorities. For example, reporting safeguarding concerns to the Local Authorities and the Police.

- [Whistleblowing Policy](#)

Next year we will develop a Whistleblowing Policy. The policy will support and encourage staff, volunteers and service users to report any safeguarding concerns, including modern slavery.

- [Recruitment and Selection Policy](#)

Next year, we will develop an Anti-Slavery Policy to further support the charity's work in tackling modern slavery.

We will also require all UK suppliers confirm in writing:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- They pay their employees at least the national minimum wage / national living wage (as appropriate)

4. Best Practice Guidance

We regularly monitor UK Government public bodies and relevant professional institutes for latest best practice guidance in terms of eradicating modern slavery. We strive to ensure that these ideas and innovations, where appropriate, are adopted quickly, whenever considered applicable to the charity and its supply chains.

5. Due Diligence Processes

The charity maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

Due diligence is carried out on significant suppliers where there may be a modern slavery risk. This includes a requirement for up-to-date independent evidence (for example up-to-date audited accounts) of the level of turnover/income of applicable suppliers and where their level of turnover/income is above £36 million a review of their latest modern slavery statement is performed. Suppliers operating in sectors where there is a greater risk of modern slavery are subject to review even if their turnover is below the limit at which a modern slavery statement is required.

6. Risk Assessment

We risk assess whether there are any parts of our business and supply chains where there is a risk of slavery and human trafficking taking place. We assess our key suppliers for modern slavery risks by evaluating their modern slavery statements and engaging in dialogue with them to ensure alignment with our ethical standards. Our risk assessment, taking account of the nature of the charity's work, our services, operating environment and sources of supply, has assessed the risk of modern slavery as low.

7. Measuring Effectiveness

The Chair of the Board of Trustees (Designated Safeguarding Trustee) and the charity's Designated Safeguarding Lead consider the effectiveness of our measures for ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains and reports to the Board of Trustees accordingly.

Modern Slavery monitoring and vigilance is an agenda item at all relevant contract management review and safeguarding meetings. This in turn, allows for formal reporting of any issues or concerns, to the Board of Trustees.

8. Training for Staff and Volunteers

We provide ongoing advice and guidance to all staff and volunteers who have safeguarding and procurement responsibilities.

We also provide accredited safeguarding training to all staff and volunteers at a level appropriate to their role which includes identifying the risks and signs of modern slavery as well as the actions that need to be taken if there are concerns.

In addition, we ask all staff and volunteers to look for signs of abuse, including modern slavery (as detailed in our safeguarding policies) when speaking to or meeting people who access our services or when a supplier's employees attend our premises or events.

We will ensure that all New Europeans Association Ltd suppliers have an appropriate best practice modern slavery statement in place.

9. Board of Trustees Approval

This statement has been approved by New Europeans Association Ltd's Chair and Board of Trustees on 16 December 2024 and will be reviewed on 20 January 2025.