



DOGS TRUST

The Annual Slavery and Human Trafficking Statement– Version 2.0

03 April 2019



KEY DOCUMENT INFORMATION	
Document Ownership and Date	
Document owner	Company Secretary
Date of this version	03 April 2019
Audience and Context	
Applies to	All Trustees and directors of group companies
Related policies and procedures	Board Manual



1. BACKGROUND - OBLIGATION TO MAINTAIN A SLAVERY AND HUMAN TRAFFICKING STATEMENT: MODERN SLAVERY ACT 2015

The Dogs Trust statement of steps taken to ensure that slavery and human trafficking is not taking place (the 'Statement') is located in [Section 5](#).

The Modern Slavery Act 2015 (the 'Act') requires that any commercial organisation in any sector which supplies goods or services, and carries on a business or part of a business in the UK, and is above a specified total turnover, must produce a slavery and human trafficking statement for each financial year of the organisation.

Regulations have set a total turnover threshold of £36m. The Statement must set out what steps they have taken during the financial year to ensure that modern slavery is not occurring in their supply chains and their own organisation.

The Statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or its own business.

2. MEANING OF SLAVERY AND HUMAN TRAFFICKING

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking.

Definition of Slavery and Servitude

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.



Definition of Forced or Compulsory Labour

Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

Definition of Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.

3. INFORMATION TO BE INCLUDED IN THE STATEMENT

The Act does not prescribe what a statement must include or how it should be structured. It does, however, provide a non-exhaustive list of information that may be included. A statement may include information about:

- a. the organisation's structure, its business and its supply chains;
- b. its policies in relation to slavery and human trafficking;
- c. its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- d. the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
- e. its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;



f. the training and capacity building about slavery and human trafficking available to its staff.

4. STATEMENT FILING OBLIGATIONS

The obligation to keep the Statement came into force from the first financial year on or after 31 March 2016.

Organisations should seek to publish their statement as soon as reasonably practicable after the end of their financial year. In practice the government guidance encourages organisations to report within 6 months of the organisations financial year end. Organisations may wish to publish these statements at the same time as they publish other annual accounts.

This is the second Statement for Dogs Trust. It has been produced for the financial year commencing 1 January 2018 – 31 December 2018.

The Act requires each organisation to publish a slavery and human trafficking statement on their website and to include a prominent link on their homepage.

5. DOGS TRUST GROUP OF COMPANIES SLAVERY AND HUMAN TRAFFICKING STATEMENT

Dogs Trust acknowledges that it has an obligation under the Modern Slavery Act 2015 to publish a slavery and human trafficking Statement setting out the steps the charity is taking to ensure that slavery and human trafficking are not taking place in any of its supply chains or in its own business.

5.1. DOGS TRUST STRUCTURE

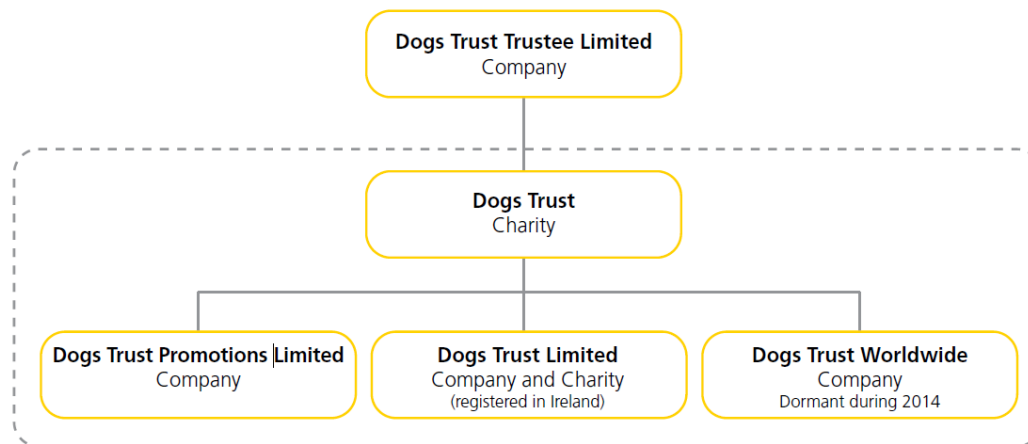
Founded in 1891, Dogs Trust (formerly the National Canine Defence League) is the largest dog welfare charity in the UK. Our mission is to bring about the day when all dogs can enjoy a happy life, free from the threat of unnecessary destruction. Our key areas of work are as follows:

- Each year we care for around 16,000 dogs at our nationwide network of 20 Rehoming Centres. No healthy dog is ever destroyed.
- We run subsidised neutering campaigns in areas of the UK with the most acute stray dog problems.



- Our Education Officers give thousands of classroom presentations every year. Free teaching resources are made available to all schools in the UK.
- Our FREEDOM Project helps pet owners who are fleeing domestic violence by fostering their animals while they start a new life.
- The HOPE Project gives preventative veterinary care to dogs belonging to homeless people.
- We advise government on any matters concerning dog ownership.
- We have a subsidiary charity in Ireland (Dogs Trust Limited, registered in Ireland) that runs a rehoming centre in Dublin.
- We assist overseas animal welfare charities by training their staff in best practice.
- We operate a network of 39 charity shops in the UK
- Our Dogs School programme provides training to thousands of dogs and their owners each year.
- We conduct research on dog behaviours through our Generation Pup research program and provide training and behaviour advice to dog owners.

The Charity is an unincorporated charitable association governed by a constitution embodying its rules and principles.





The Charity also has three other dormant subsidiaries, all of whom are registered in England and Wales (Dogs Trust Limited, NCDL Limited and Sponsor a Dog Limited). The Charity is an unincorporated charitable association governed by a constitution embodying its rules and principles. In 2014 the Charity set up a Corporate Trustee, Dogs Trust Trustee Limited, to act as sole Trustee. The previous trustees of the Charity became directors of Dogs Trust Trustee Limited.

5.2. POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

Dogs Trust does not support or knowingly engage with any business involved in slavery or human trafficking. We are committed to acting ethically and with integrity in all of our business relationships and to implementing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains or in any part of our business. We expect all those in our supply chain and contractors to comply with our values.

5.3. SUPPLY CHAIN RISK ASSESSMENT AND PROCESSES

Key areas of risk identified and risk mitigation measures:

- **Grant expenditures** – Dogs Trust provides grants to partner organisations in the UK and around the world for specific projects to improve the lives of dogs worldwide and to eliminate human deaths from dog transmitted rabies. We undertake formal appraisals of each project and partner organisation before making a grant. All grants are subject to a grant agreement. We conduct ongoing monitoring and evaluation of all grant projects to ensure they are being ethically conducted and are complying with the applicable grant agreement.
- **Investments** – Ethical restrictions are imposed on investments made by our fund manager.
- **Corporate Partnerships** – We undertake due diligence checks on our corporate partners. Where possible, we maintain long-standing relationships with suppliers and companies with whom we contract and make clear our expectations for ethical business behaviour;
- **Procurement** - We acknowledge that a higher level of risk is likely to vest in the procurement of veterinary supplies and equipment, office supplies, building materials, ICT equipment, food and some services' soft facilities such as gardening and cleaning. We require all new suppliers to sign up to our commitment that supply chains are free from forced labour practices.



5.4. EFFECTIVENESS

We monitor the effectiveness of our policies and procedures to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. Monitoring includes:

- Audits by independent organisations;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

Our Board of Trustees, Directors and senior management hold ultimate responsibility for assessing and ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

5.5. TRAINING AND CAPACITY BUILDING

We are committed to raising awareness amongst our trustees and staff, our stakeholders and suppliers. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, and we will provide training to relevant members of staff.

6. DOCUMENT HISTORY AND REVIEW

Version and Approval History			
Version No	Version Date	Version Comments	Approved By
1.0	03 April 2018	Initial statement - 2017	Graeme Robertson
2.0		Second statement - 2018	
Future review			
Next review due		Before 30 June 2020	



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

Graeme Robertson, Director and Chairman

For and on behalf of Dogs Trust Trustee Ltd