

New Dialogue Modern Slavery Policy and Procedures

On 28 November 2025, New Dialogue became the new home of Healthwatch Kingston upon Thames.

Since its creation, our organisation has been registered as the charitable company 'Healthwatch Kingston upon Thames', established to deliver the Healthwatch statutory service for the Royal Borough of Kingston upon Thames.

Following careful consideration, the Healthwatch Kingston Board agreed to change the charitable company name to 'New Dialogue'.

This change relates solely to our organisation's name. The legal entity remains the same, and there is no change to governance, staff, or the delivery of the Healthwatch Kingston upon Thames statutory service.

1. Scope (Last updated 10.02.26)

This policy applies to

Employees	X
Contractors	X
Volunteers	X
Partners	X
Suppliers	X
Consultants	X

Unless otherwise stated, this policy and procedure is non-contractual, does not form part of any contract of employment, and may be adapted or amended at any time by the Board.

2. Policy Statement

New Dialogue/Healthwatch Kingston is zero-tolerant of modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to dealing with our responsibility to eradicate modern slavery throughout our supply chains.

We expect the same high standards from all of our contractors, suppliers and other business partners and will abide by our responsibility to ensure that those we deal with exercise prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for New Dialogue/Healthwatch Kingston or on our behalf in any capacity, including employees at all levels, Officers, contractors, suppliers, external consultants, third-party representatives, business partners, volunteers and members of the Board.

3. Definitions

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

4. External Standards

This statement is in accordance with the [Modern Day Slavery and Trafficking Act 2015](#).

5. Procedures

- The Board have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The Chief Executive Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal

control systems and procedures to ensure they are effective in countering modern slavery.

- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given training on it and the issue of modern slavery in supply chains.

Expectations of employees

- You must ensure that you read, understand and comply with this policy.
- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You must notify your manager OR the Chief Executive Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains of any supplier tier at the earliest possible stage.
- If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Chief Executive Officer OR report it in accordance with our [Safeguarding](#) and/or [Whistleblowing Policy and Procedure](#) as soon as possible.

Raising concerns

- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Chief Executive Officer.
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

Breaches of this policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6. Supporting Documents:

[Modern slavery statement | Royal Borough of Kingston upon Thames](#)