



THE ABBEYFIELD SOCIETY

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023

We are committed to improving our practices to combat slavery and human trafficking.

Organisation's structure

We are a provider of sheltered housing, residential care homes and care at home services for older people. We have over 900 (full time equivalent) employees and operate within the United Kingdom. We have an annual turnover of *more than £36 million*.

Our business

Our business is organised into Housing and Care.

Our supply chains

Our supply chains include food, consumables, utilities and agency workers. We also sub-contract labour through the acquisition of services relating to property construction and ongoing maintenance and repair.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy (which can be found on our website) reflects our commitment to acting ethically and with integrity in all our business relationships and to identifying areas of risk and working with our suppliers to eliminate modern slavery from our supply chains. The policy has been reviewed and updated this year.

As set out in our Whistleblowing Policy, we encourage all our workers to report any concerns related to the direct activities of our organisation, or our supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to ensure that workers can raise concerns with Abbeyfield management without fear of victimisation, subsequent discrimination, disadvantage or dismissal. It is also intended to encourage and enable workers to raise serious concerns within Abbeyfield in the knowledge that those concerns will be taken seriously and investigated appropriately. In addition to the internal routes for raising a concern, the whistleblower may seek advice from Protect, an independent charity offering confidential advice and support to anyone concerned about wrongdoing or malpractice at work and are unsure whether or how to raise it.



We also have safeguarding policies and procedures which specifically highlight Modern Slavery as a type of abuse and provide guidance on what to do to raise a concern about this. These policies and procedures are reviewed annually and approved by the Board.

We have developed a new policy this financial year in relation to the use of agency staff – The Agency Workers Policy. This states that there must be a written contract in place between Abbeyfield and the agency before agency workers may be hired. The contract must be signed by a director who has the appropriate delegated authority to sign the contract. In care services, only agencies registered with CQC are used. The contract with the agency must include confirmation that all agency workers have been recruited in accordance with prevailing employment legislation and specifically that for all workers the following have been obtained:

- Proof of their identity, with a recent photograph
- Evidence of their right to work in the UK
- References, from previous and/or their most recent employer
- a full employment history to include reasons for leaving employment, with a satisfactory explanation of any gaps
- a satisfactory enhanced Disclosure and Barring Service (DBS) check within the last three years.
- documentary evidence of any relevant training and qualifications
- confirmation of their physical and mental fitness to perform the duties required.

Induction of agency workers includes an explanation of key policies including whistleblowing and safeguarding policies.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we also have in place systems to:

- Review central government guidance on occupations most at risk.
- Analyse our supply chains in order to identify areas of high risk.
- Ensure that all potential and existing suppliers are aware of our policy relating to modern slavery.
- Undertake to only contract with those organisations whose approach to modern slavery coincides with our own.
- Give us visibility of all recruitment in Abbeyfield through the implementation of an Applicant Tracking System which automates our end to end recruitment process.



- Ensure agency workers are only hired in accordance with the Agency Workers Policy as referred to above.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- A practice of procurement via approved frameworks where possible.
- All new and potential suppliers evidencing commitment to eliminating modern slavery from their supply chains prior to commencement of contract.
- Property works suppliers are also required to be safe contractor / CHAS accredited whereby they have to adhere to their code of conduct, which includes strict compliance with modern slavery legislation.
- On appointment of a new supplier, ensuring that our Modern Slavery Policy is clearly and effectively communicated.
- Continuously monitoring our supply chains and reviewing suppliers' policies towards modern slavery through the ongoing contract management process.
- Working with our suppliers to ensure that any areas of concern are identified quickly and remedial measures are implemented effectively and as a matter of urgency.

We will not hesitate to report such offences against the Act to the relevant legal enforcement agencies.

As a minimum requirement, we would expect all our suppliers, their agents and sub contractors to adhere to the following code of conduct:

- All workers to be paid the prevailing minimum wage applicable to the location in which they are employed. All wages to be payable in full, excluding deductions, unless expressly agreed with the worker.
- All workers to have a contract of employment, setting out terms and conditions of employment, working hours and grievance procedures.
- Working conditions and safety provisions should be regularly inspected by our supplier or their agent to ensure the health and safety of workers.
- A worker's documents will remain their property and are not to be retained by their employer: all workers shall be free to leave at any point.



Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, modern slavery is covered in safeguarding training which is mandatory for all our employees and volunteers.

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

We will increase the number of areas which are put out to formal tender to ensure that suppliers are under contract and bound to adhere to modern slavery policies.

We will nurture existing supplier relationships in high-risk areas with the aim of reducing reliance on products or services where geographical location or occupations are susceptible to modern slavery.

We will review and, where possible, improve contractor monitoring processes to ensure that contractors are complying with modern slavery policies and related legislation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2023. It was approved by the Board on 2nd October 2023.

A handwritten signature in black ink, appearing to read 'Mike Turner', written over a light grey rectangular background.

Mike Turner (Chair)

The Abbeyfield Society

Date: 4th October 2023

TITLE	Ant-Slavery and Human Trafficking Policy		
Policy ref	LG004P	Approval date	February 2023
Owner	Director of Legal & Compliance	Planned review date	February 2026
Approved by	Audit & Risk Committee on behalf of the Abbeyfield Board		

Version	Purpose/change	Author	Date
1.0	New policy	Petra Taylor	November 2019
2.0	Policy reviewed, including amends to the policy objectives, the addition of a new section (4.1) on TAS's anti-slavery objectives and linking in the Anti-Slavery and Human Trafficking Statement.	Petra Taylor	November 2022

1 Background	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.
2 Objectives	<p>The aims of this policy are to:</p> <ul style="list-style-type: none"> • set out the responsibilities of The Abbeyfield Society (TAS), and of those working for and on its behalf, in observing and upholding its position on modern slavery and human trafficking; and • provide information to those working for and on TAS's behalf on how to identify and report concerns regarding modern slavery and human trafficking.
3 Scope	<p>This policy applies to all persons working for or on behalf of TAS in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers agents, contractors, external consultants, third-party representatives and business partners.</p> <p>This policy does not form part of any employee's contract of employment and it may be amended at any time.</p>
4 Policy 4.1	<p>Objectives</p> <p>TAS has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships</p>

	<p>and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere its own business or in any of its supply chains.</p> <p>TAS is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. It expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, it includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and it expects that its suppliers will hold their own suppliers to the same high standards.</p> <p>4.2 Responsibilities</p> <p>The CEO has overall responsibility for ensuring this policy complies with TAS’s legal and ethical obligations, and that all those under its control comply with it.</p> <p>The Director of Legal & Compliance 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.</p> <p>Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.</p> <p>Comments, suggestions and queries are encouraged and should be addressed to the Director of Legal & Compliance.</p>
<p>4.3</p>	<p>Compliance with the Policy</p> <p>All staff must ensure that they read, understand and comply with this policy and accompanying procedure.</p> <p>The prevention, detection and reporting of modern slavery in any part of TAS’s business or supply chains is the responsibility of all those working for it or under its control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.</p> <p>If an individual believes or suspects that a conflict with this policy has occurred, or may occur in the future the procedure below should be followed:</p> <ul style="list-style-type: none"> • Report the concerns either verbally or in writing to their immediate manager; • If they feel you cannot report the issue to their immediate manager,

- they should report the case to a more senior manager/director;
- If they feel that they cannot report the matter to their immediate or more senior manager/director, they can report the matter to HR or any other senior manager/director of their choice within Abbeyfield.

In the event of these steps failing or being inappropriate, the individual concerned should write to, or contact the Director of Legal & Compliance..

All staff members are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of TAS's business or supply chains of any supplier tier at the earliest possible stage.

If an individual believes or suspects a breach of this policy has occurred or that it may occur, they must notify their immediate manager or report it in accordance with the Whistleblowing Policy (LG038P) as soon as possible.

If an individual is 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, they should raise it with their manager or the Director of Legal & Compliance

TAS aims 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. It is 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 its own business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an individual believes that they have suffered any such treatment, they should inform the Director of Legal & Compliance immediately. If the matter is not remedied, and the individual concerned is an employee, they should raise it formally using the Grievance Policy (S014P), which can be found on Connect or obtained from the HR team.

4.4

Communication and awareness of this policy

Training on this policy, and on the risk the TAS business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for it, and regular training will be provided as necessary.

The commitment to addressing the issue of modern slavery in TAS business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter.

<p>4.5</p>	<p>Breaches of this policy Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.</p> <p>TAS may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.</p>
<p>5 Finance, Value for Money & Social Value</p>	<p>N/A</p>
<p>6 Linked policies</p>	<p>Grievance Policy (S014P) Safeguarding Adults Policy (LG031P) Whistleblowing Policy (LG038P)</p>
<p>7 Relevant Legislation / Regulation</p>	<p>Modern Slavery Act 2015 Public Interest Disclosure Act 1998</p>
<p>8 Guidance</p>	<p>None.</p>
<p>9 Review</p>	<p>Every 3 years, subject to any regulatory or legislative updates.</p>
<p>10 Procedure(s)</p>	<p>None.</p>
<p>11 Statement</p>	<p>Anti-Slavery and Human Trafficking Statement</p>