

Modern Slavery Statement

The UK Home Office defines Modern Slavery as: “A broad term used to encompass the offences of ‘slavery, servitude and forced or compulsory labour’ and ‘human trafficking’.

Please see the attached appendix for the full Home Office definition of Modern Day Slavery.

Following the recent Modern Slavery Act 2015, a statement is required from all organisations with an annual turnover exceeding £36 million, to provide greater awareness of the dangers of modern day slavery and to improve transparency within supply chains.

As a charity committed to care, choice and independence we welcome this legislation and recognise the need to engage with this issue. In her Home Office response to the Modern Slavery Act, Theresa May recognised that in order to tackle modern slavery it is vital for ‘all of us to take a part’, as it is a complex and often invisible crime and therefore must be the concern of every individual and organisation. At Hft, we understand that it is imperative not to underestimate this social responsibility. Collectively this measure brought in by the Modern Slavery Act 2015 hopes to achieve a network of conscientiousness which will drive out these risks to human autonomy, wellbeing and freedom.

At Hft, we pride ourselves on the high quality training, support and ethical procedures that keep the people we support, and the people we employ, safe and secure. However we are aware of the need to use these skills to develop an effective action plan, to drive out the potential risks of modern slavery in our supply chains and help to connect a network of collective diligence.

Throughout the next financial year we will be integrating further procedures into our existing risk management systems with the purpose:

- 1) To increase awareness of the potential risks of modern slavery across the extended organisation structure of Hft, and how to tackle cases of slavery if and where they do occur
- 2) To improve transparency in our supply chains

On a local level, our front line services, the people we support, families, carers and head office staff will receive tailored, awareness raising information and training on how to identify, react and deal with suspected instances of modern slavery in day to day life.

5/6 Brook Office Park Folly Brook Road Emersons Green Bristol BS16 7FL
Tel: 0117 906 1700 Email: info@hft.org.uk

www.hft.org.uk

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As part of Hft's due diligence processes into slavery and human trafficking, the approval process of our national supply chains will incorporate an oral or written supplier code of conduct. Similar awareness raising resources cited above will be provided to all our larger suppliers. We will actively seek suppliers who implement suggested modern slavery prevention and awareness raising measures.

Hft will not support or deal with any business knowingly involved in slavery or human trafficking.

We will also be adding modern slavery into the section relating to recognising abuse in our safeguarding training for the people we support and our support workers. We hope that this will go further than protecting the people we support, to having wider reaching effect on the safety of the local community.

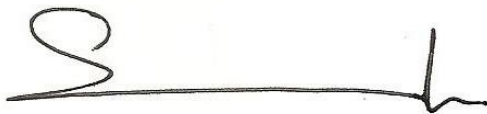
Through these measures we hope to create a culture of awareness and confidence in taking action, closing down potential areas of invisibility.

The Trustees and the Executive Team shall take the responsibility for guaranteeing this policy statement and its objectives are implemented and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chains.

This policy statement will be reviewed annually from the 31st October 2015.

For more information on our Modern Slavery Strategy please consult the 'Further Information' section below this statement.

Signed:



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Simon Llewellyn
Acting Chairman



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Robert Longley-Cook
Chief Executive

Further Information

Organisational Structure

Hft is a charitable trust which directly employs over 2,500 people across the country, along with over 600 relief staff. The workforce is made up mainly of our frontline support workers and operational staff in our 6 divisions. Head Office employs just over 100 people out of the total number.

Supply Chains

Our suppliers vary significantly in size, type and the length of term.

The range is outlined below:

- 1) The local sourcing of agency staff,
- 2) The use of national supply chains – such as suppliers of office supplies,
- 3) The local use of one off supply chain – such as catering staff,
- 4) The use of contractors for building and estate development and management,
- 5) The suppliers of Hft Trading

Due to the diversity in supplier and in order to tackle modern day slavery effectively and sustainably on every level, we have chosen to break down these suppliers into long-term national and short-term local.

National Suppliers

Many of our national suppliers are procured through the Crown Commercial Service, a governmental body that works with over 2,600 companies to supply regulated, value for money resources to the public sector.

We are also in the process of creating an assured providers list for the agencies we use for support staff in the interim periods of recruiting permanent Hft staff.

All the relationships we hold with our long-term, national suppliers are subject to procedures that include a contract of compliance with Home Office '3 Step Check' right to work requirements. In addition to this, we will be implementing a Supplier Code of Conduct that lays out our policy and expectations in relation to our Modern Slavery Policy. This will be an either an oral or written agreement with our existing and future long-term national suppliers.

Local Suppliers

Local transactions of resources and product are often short term and small scale. For these transactions, the use of contract of compliance may be of little impact and effectiveness.

We will be working with our Partnership Forum, a place where Hft support staff can be more involved in the development of Hft, to discover the best way to support the frontline services to approach this subject.

This may include practical information on:

- 1) What modern slavery may look like on a day-to-day basis
- 2) How a victim of slavery may behave and what signs to be aware of
- 3) How to react to potential modern slavery risks
- 4) Who to speak to if concerned about the wellbeing of any member of staff, directly or indirectly employed by Hft
- 5) Where to find help for victims

For long-term and national suppliers we will provide this practical information with the expectation that they complete the briefing with their members of staff, as part of a Supplier Code of Conduct.

Internal Awareness Raising Channels

We believe the awareness raising measure set out above would also be useful to implement within Head Office, and will be sending out similar information to all Head Office staff.

We will be working with our Family and Carer Support Service (FCSS) in order to develop a tailored brief for the people we support and their families and carers. Involving this group of people is vital in tackling this issue, as they will often spend a significant amount of time with Hft and agency staff.

We are developing a section on modern slavery to insert into our training and online e-learning on safeguarding that will build on our training on how to deal with circumstances of neglect and domestic, physical and financial abuse.

Appendix

i. Definition of Modern Day Slavery

The Home Office defines modern day slavery as:

“A broad term used to encompass the offences of ‘slavery, servitude and forced or compulsory labour’ and ‘human trafficking’. These offences are closely related but not identical in a legal sense.

Slavery is where ownership is exercised over a person; servitude involves the obligation to provide services imposed by coercion; forced or compulsory labour involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself voluntarily; human trafficking concerns arranging or facilitating the travel of another with a view to exploiting them.”