



Hft **modern** **slavery** **statement**

Introduction

This statement sets out Hft's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and in our supply chains.

This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

In previous years, our organisation has published its statement no later than 30 June. This year we recognise that we are publishing this statement later than expected. This is because of reduced staff capacity and other coronavirus-related priorities during the pandemic. However, our later reporting does not in any way mean that our focus and responsibilities have lessened. At Hft we continue to take our responsibilities regarding modern slavery very seriously and our organisation is fully committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are also free from slavery and human trafficking.

Hft organisational structure

This statement covers the activities of Hft.

Hft is a national charity supporting people with learning disabilities and their families. We believe in a world where anyone with a learning disability can live within their community with all the choice and support they need to live the best life possible.

Hft has a geographical presence throughout England and also a presence in North Wales. We directly employ over 2,500 staff along with over 600 relief workers.

The majority of our workforce are either frontline support workers or frontline operational staff. In addition we have circa 120 staff who are employed at our Central Support Office in Emersons Green, Bristol.

At Hft we continue to be vigilant in looking for signs of modern slavery, especially at a local level in our frontline services.

Hft supply chains

Our range of suppliers vary in size and type however what is consistent is our desire to ensure our suppliers are ethical and understand their responsibilities regarding modern slavery and human trafficking.

Generally suppliers at Hft can be categorised as either national or local suppliers. The following list is non-exhaustive but is provided for descriptive purposes of the range and type of suppliers Hft use:

- Using an agency to source staff on a local basis
- Using supply chains, such as providers of regular office supplies, in an annual contract
- Using single use suppliers, such as for training or catering for an event
- Using specialist contractors for building and estates development and management

The services of suppliers are procured via our terms and conditions of purchase, which specify the contractual relationship between Hft and the supplier and come into effect on the date of the purchase order. These terms include specific provision that at Hft we are committed to better understanding our supply chains and working towards greater transparency and responsibility towards people working in them, in accordance with our policy of observing the spirit of the Modern Slavery Act 2015.

Where suppliers are required to submit a Modern Slavery Statement they should do so.

Suppliers shall ensure they are not directly engaged in slavery, servitude, forced or compulsory labour, or human trafficking.

Suppliers shall take reasonable and proportionate steps, having regard to the nature of their business, to identify potential high and medium risks of slavery, servitude, forced and compulsory labour, or human trafficking in their supply chains. To the extent it is commercially practicable, suppliers should use their buying power to influence their suppliers from such prohibited activities.

Supplier due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Hft will not support or do business with any organisation that we know, or suspect, to engage in slavery or human trafficking. Instead, at Hft we will seek to work with suppliers who implement modern slavery prevention and awareness raising measures.

We have also created an assured provider list of agencies we use for additional frontline support staff and, on occasion, for agencies that we may also engage with to meet interim demands for resource whilst we are recruiting permanent staff.

Responsibility

Responsibilities for our anti-slavery initiatives are as follows:

- **Policies:** The Executive Leadership team are responsible for putting in place and reviewing policies
- **Risk assessments:** The Executive Leadership team are responsible for identifying risks that are related to modern slavery
- **Investigations/due diligence:** Line management and Hft's safeguarding team are responsible for conducting investigations in relation to known or suspected instances of slavery and human trafficking

Training

We require all staff within our organisation to complete training. Modern day slavery is regarded as an integral part of our face-to-face training on safeguarding. This training includes a group discussion about the types of abuse and how to spot tell-tale signs of behaviours that indicate abuse. In addition to this, we continue to raise awareness of this issue via the implementation of mandatory e-learning. Our modern slavery e-learning training includes, but is not limited to, the following:

- How to identify the signs of modern slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential modern slavery issues to the relevant parties within our organisation
- What external help is available

Relevant policies

At Hft we operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy** – We encourage all our staff, workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy to make disclosures, without fear of retaliation
- **Employee handbooks** – Our handbooks make clear the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour
- **Supplier Terms** - We are committed to ensuring that suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of our supplier purchase terms will lead to the termination of the business relationship
- **Recruitment** – We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency it is using before accepting workers from that agency

Close

The Trustees and Executive Team recognise their accountabilities for certifying that this policy statement and its objectives are implemented. This policy statement will be reviewed on an annual basis with the next review due by 30 June 2021.

This statement was approved on 7 September 2020 by representatives from our Trustees and Executive team:

A handwritten signature in dark ink, appearing to read 'Amanda Bunce'.

Amanda Bunce
Chair of Trustees

A handwritten signature in dark ink, appearing to read 'Jacqui Roynon'.

Jacqui Roynon
Executive Director of People and Communications

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September 2020