



**Hft**  
**modern**  
**slavery**  
**statement**  
**2020 - 2021**

# Introduction

This modern slavery statement applies to Hft for our financial year 1 April 2020 to 31 March 2021.

The statement sets out our actions to understand all potential modern slavery risks related to our organisation and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our operations or supply chains.

## Definitions

Hft considers that the words 'modern slavery' cover:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained, or having unlawful and unwelcome restrictions placed on freedom of movement

## Hft's organisational structure

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.

We have a geographical presence throughout England and also in North Wales. We employ over 2,600 people, along with over 500 relief workers and around 80 active volunteers.

The majority of our workforce are either frontline support workers, or frontline operational staff.

We also have about 230 Central Support Services staff based out of Emersons Green, Bristol, though many of our Central Support Services team work out in the regions normally. This year, as many of our Central Support Services staff as possible have been working from home, in line with the Government's instructions.

# Hft's operations

We recognise that people with learning disabilities can be at greater risk from modern slavery as they may be targeted because of their disabilities. It is vitally important to us that the people we support do not become victims of modern slavery and that they live the best lives possible.

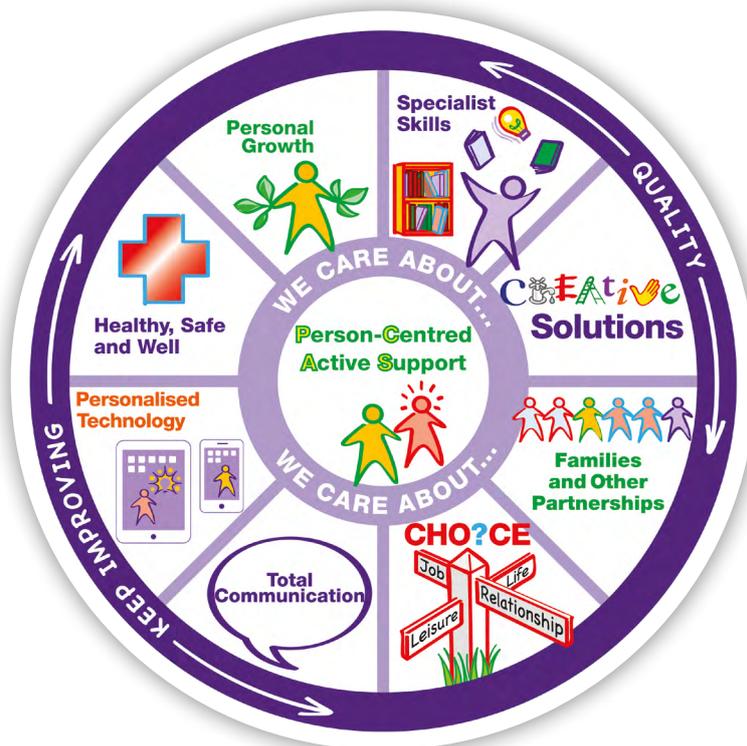
## Care Quality Commission

As a residential and community services provider regulated by the [Care Quality Commission](#), we are independently monitored, inspected and rated to make sure we meet fundamental standards of quality and safety.

We also have the following internal policies, procedures and practices to help keep the people we support free from modern slavery:

### Fusion Model of Support

Underpinning our support work is our Fusion Model of Support:



The model is based on Person-Centred Active Support (PCAS). PCAS is a way of supporting people so that they can actively participate in meaningful pursuits and relationships. As a result, the people we support have more control over their lives and they experience greater levels of inclusion, independence and choice. As such, our Fusion Model of Support makes a significant contribution to protecting the people we support from the risks of modern slavery.

## Hft's safeguarding group

Modern slavery is included in the scope of our Safeguarding Group. While we consider safeguarding to be everyone's responsibility in Hft, our Safeguarding Group reviews and shares learning from our own and others' experiences. It is also our primary provider of safeguarding resources.

## Hft's operational and people policies

We recognise that employees, relief and agency workers and volunteers can be both victims of modern slavery and also play a vital role in keeping the people we support safe. We have a wide range of operational and people policies which contribute to keeping everyone at Hft free from modern slavery:

- Agencies supplying care staff
- Bribery
- Bullying & harassment
- Capability
- Corporate social responsibility
- Criminal records checks
- Disciplinary
- Disclosure and barring
- Diversity & equality
- Establishing the right to work
- First aid
- Fraud
- Friends & family at work
- Gifts to staff
- Giving & seeking a reference
- Grievance\*
- Health & safety
- Key holding
- Misuse of drugs & alcohol
- Operational standards
- Recruitment & selection
- Relationships at work
- Review of relief workers' registration
- Social media guidance
- Social networking policy
- Staffing
- Supervision & appraisal
- Supporting people with their money
- Use of phones & recording devices
- Visitors
- Volunteer management
- Volunteers handbook
- Whistleblowing\*
- Work experience
- Working time

*\*As with almost all of our people policies, employees are able to continue to use our Grievance and Whistleblowing procedures during coronavirus (COVID-19).*

One of our core values is **we have the courage to listen, speak up and take action**. We offer a sixty-minute e-learning module to raise awareness of modern slavery and human trafficking, and to help our people recognise their personal role in identifying and reporting concerns.

# Hft's supply chains

To deliver our services we purchase goods and services from the UK and abroad. Our main supply chains include staffing, software, products, services and food.

Our 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:

- agencies to source staff on a local basis
- supply chains, such as providers of regular office supplies, on an annual contract
- single use suppliers, such as for training or catering for an event
- 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 our suppliers are required to submit a Modern Slavery Statement we insist that they do so.

Suppliers shall ensure they are not directly engaged in modern slavery.

Suppliers shall take reasonable and proportionate steps, having regard to the nature of their business, to identify potential high and medium risks of modern slavery in their supply chains. To the extent it is commercially practicable, suppliers should use their buying power to influence their suppliers not to participate in modern slavery.

# 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.

We have the following policies, procedures and practices to help keep our supply chains free of modern slavery:

- Agencies Supplying Care Staff
- Fraud
- Purchase orders
- Procurement
- Whistleblowing

# Impact of Coronavirus Pandemic

During the coronavirus pandemic, we have continued our activity to identify and address risks of modern slavery in our operations, staffing and supply chains. As well as focusing on the health, safety and wellbeing of our people, we have also considered how changes in our operating environment may have led to new or increased risks of modern slavery.

We have monitored our risks by significantly shifting our normal focus on general business continuity and risk activities towards pandemic continuity and risk; and by increasing both the frequency and scope of those activities.

As a result, we have adapted our activities and priorities as follows:

- Co-ordinating our response to coronavirus (COVID-19) through a COVID-19 Planning Committee, comprised of senior staff and subject matter experts
- The committee meets frequently, even daily when needed
- Publishing a wide range of carefully tailored COVID-19 materials to the people we support and to our staff. For example:
  - accessible resources for people we support, family carers and the wider family e.g. about vaccination
  - work and wellbeing information and support for staff e.g. PPE
  - social media and web content to inform and reassure
- Remote working and meeting, where practical
- Adapting our policies, procedures and practices to protect our people

We are also maintaining and developing other business continuity tools such as the Emergency Planning Committee and the general business continuity plan.

Despite the challenges presented by the coronavirus (COVID-19) pandemic Hft is pleased to:

- confirm that our modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times and
- submit this modern slavery statement on time

# Hft's potential exposure to modern slavery

Taking into account the measures we take to protect our operations, staffing and supply chain from the risks of modern slavery, Hft considers our potential exposure to be relatively limited overall, even during coronavirus (COVID-19).

We consider the main potential for exposure to lie in the purchase of goods from overseas.

## Steps

Hft carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in our organisation or supply chains, including conducting a review of the controls of our suppliers.

We have not, to our knowledge, conducted any business with another organisation which has been found to have relied on modern slavery for good or services.

Hft has taken the following steps to ensure that modern slavery is not taking place:

- reviewing contracts to include termination if suppliers are or are suspected, to be involved in modern slavery
- measures in place to identify and assess potential risks in our supply chains
- undertaking impact assessments of our services on potential instances of slavery
- creating action plans to address risk to modern slavery.

## Responsibility

Responsibilities for our anti-slavery initiatives are as follows:

- Policies: The Executive Board is responsible for putting in place and reviewing policies
- Risk assessments: The Executive Board is 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 modern slavery

# Learning and Development

We offer all staff within our organisation training on modern slavery. This is also regarded as an integral part of our face-to-face training on safeguarding. The 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 concerns within Hft
- What external help is available

## Summary

The Trustees and Executive Board 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 31 March 2022.

This statement was approved on 18 March 2021 by representatives from our Trustees and Executive Board:



**Amanda Bunce**  
Chair of Trustees



**Kirsty Matthews**  
Chief Executive Officer

