

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Introduction

This statement sets out Brandon'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 its supply chains.

As part of the care sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

This statement covers the activities of Brandon Trust

Brandon Trust is a charity supporting adults and children with learning disabilities and autism. The organisation currently operates solely in the UK

The following is the process by which the organisation assesses whether or not particular activities are high risk in relation to slavery or human trafficking

The activity below is considered to be at risk of slavery or human trafficking:

- The area of risk is likely to be in the recruitment of staff to the organisation and in the supply of temporary staff by staffing agencies

Responsibility

Responsibility for the organisation's anti-slavery initiatives are as follows:

Policies: the HR, Operations and Finance Directorates in conjunction with the recognised trade unions, are responsible for putting in place and reviewing Brandon policies.

- **Risk Assessments:** are carried out in respect of staff joining the organisation whilst waiting for relevant checks to take place, however all staff directly employed will have to provide the recognised proof of right to work in the UK at interview stage. Agencies responsible for recruitment of temporary workers will be expected to provide assurances that relevant checks on the right to work in the UK have been carried out. Where Brandon, or agencies, are aware that workers may

originally have been recruited abroad then further checks may be required to assure ourselves that exploitation has not occurred in the country of origin. Brandon will be especially aware of the possible increased risk of exploitation of people with learning disabilities when conducting risk assessments.

- **Investigations / Due Diligence:** The HR Department are responsible for ensuring the appropriately trained managers carry out investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** Training will take place with relevant Procurement, Recruitment and HR staff, to better understand and respond to the identified slavery and human trafficking risks.

Relevant Policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing Policy:** The organisation encourages all its workers, clients and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, clients or others who have concerns can contact the relevant person responsible or alternatively by contacting the Charity Commission.
- **The Code of Conduct:** The Brandon Code of Conduct Policy makes clear to all employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Procurement Policy:** The organisation is committed to ensuring that its 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. The organisation works with suppliers to ensure that they meet the standards expected and improve their worker's working conditions. However, serious violations of the organisation's Procurement Policy will lead to the termination of the business relationship.
- **Procurement of Agency Workers:** The organisation uses only specified, reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency. Brandon will work with the agencies to ensure any identified risk of slavery and human trafficking is dealt with swiftly and using the appropriate legal steps available. This will include those instances where workers may originally have been recruited abroad where there is a risk of exploitation in the country of origin.

- **Recruitment Policy:** The organisation's recruitment process will meet our legal responsibilities, both as an employer and as a social care organisation (imposed by CQC / DBS etc.)

Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers. The organisation's due diligence and reviews will ensure we have a compliant supply chain in relation to the Modern Slavery Act, Brandon Trust will adhere to the following due diligence procedures:

- Evaluating the risks of new suppliers in relation to the Modern Slavery Act. For example, a temporary staffing agency supplier may pose more of a risk than an IS supplier. The reason being due to the nature of the industry.
- Review bi-annually our supply chain. One of the methods we can use would be supply chain mapping. Supply chain mapping is an industry standard supplier relationship tool used by CIPS (Chartered Institute of Purchasing and Supply).
- When any potential risks are identified, an audit of the supplier will be carried out by Procurement. Steps on how the supplier can improve their practices will be shared and an action plan agreed.
- Suppliers that fail to improve their performance in line with the agreed action plan could see their working relationship with The Brandon Trust terminated.

Training

The organisation requires all HR Recruitment and Procurement professionals within the organisation to complete training on modern slavery and to sign up to one of a number of training sessions that are being carried out in 2016

The organisation's modern slavery training covers:

- our organisation's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases/services at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below the country's national living wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;

- what external help is available, for example through the modern slavery helpline, gangmasters licensing authority and "stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-Raising Programme

As well as training relevant staff, the organisation will raise awareness of modern slavery issues by circulating an email to staff which will signpost staff to Brandon's Modern Slavery and Human Trafficking Statement on the intranet.


The emails explain to staff:

- the basic principles of the modern slavery act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the modern slavery helpline.

Board Member Approval

This statement has been approved by the organisation's board of director's members, who will review and update it annually.

Signed: Lucy Hurst Brown, Chief Executive

[ 25/7/16]

Signed: Bonnie Dean, Chair of the Board

[]

Date: 25/07/16