

Modern Day Slavery Act

2019 Statement

Introduction

Modern slavery is a term used to encompass slavery, forced and compulsory labour and human trafficking. It includes both adults and children being forced to work against their free will. A common example arises where migrant workers take loans to pay for their travel to another country to work, or to pay fees to a recruitment company, with a view to repaying the money from their earnings. They become trapped in 'debt bondage' as other sums are added to the loan while they work, such as accommodation and transport costs, exceeding their capacity to make repayments and, in addition, their passports are often withheld.

Evidence suggests that the risk of modern slavery affects almost every industry and sector including food production and processing, construction, hospitality, manufacturing, shipping and transportation. Modern slavery remains a hidden blight on our global society.

In accordance with our values the ExtraCare Charitable Trust (ECCT) is committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking are not taking place anywhere in our supply chains or in our business.

Our Structure

We are a not for profit charitable trust providing homes, care services and healthy lifestyles for older people. ECCT is a company limited by guarantee (registered in England under company number 2205136); a registered charity (charity number 327816); a registered provider of social housing (4706) and a registered provider of social care. Our strategy is set by the Board of Trustees, all of whom are independent, non-executive Trustees. Operational management is delegated to the Chief Executive, supported by four Executive directors.

The Trust has a wholly-owned subsidiary, ExtraCare Retail Limited, which operates more than 50 charity shops. The work of the Shops is overseen by its Board of Directors which includes three independent non-executives, including one of ECCT's Trustees.

The Trust is headquartered in, and operates wholly in the UK. The combined annual turnover of the group is in excess of £123 million.

Our Business

We own and operate 19 retirement communities (14 retirement villages and 5 smaller housing schemes) across 11 local authorities in the UK, comprising over 3,600 individual mixed tenure apartments and bungalows (available for purchase, shared ownership or rent), offering a range of care and support for those who need it and a vibrant, activity based, healthy lifestyle.

We work with major construction companies to build and commission new villages across the UK and we undertake research and fundraising activities.

The operations, development and research and fund-raising teams are supported by a range of business-support functions including Finance, Procurement, IT and HR. We employed 1,289 employees and were supported by 2,253 volunteers.

Our Supply Chain

We are engaged in a wide range of activities including construction, housing and facilities management, delivery of social care (including the procurement of agency staff), catering, cleaning and retail and therefore have a diverse supply chain with over 620 suppliers, which range from small, local suppliers to large multi-national suppliers.

Our Policies

We have zero tolerance to modern slavery and human trafficking and we are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our policies, listed below, reflect our commitment to acting ethically and with integrity in all our business relationships.

- Our Values;
- Code of Governance;
- Code of Conduct;
- Equality & Diversity Charter, Strategy & Policy;
- Corporate Social Responsibility;
- Procurement Policy;
- Contract Management Policy;
- Recruitment Policy; and
- Whistleblowing Policy.

Our Supplier Due Diligence Processes

Our Procurement documentation includes a reference to the Modern Slavery Act 2015 and our suppliers are required to confirm compliance with the Act. We have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- Protect whistleblowers.

Supplier Adherence To Our Values

To ensure our contractors and all those in our supply chain comply with our values and ethics regarding modern day slavery we took the following action during 2018/19:

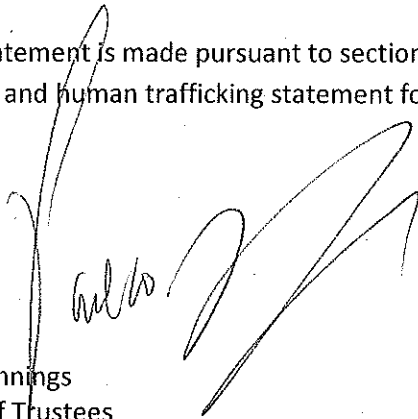
- Made a clear statement in our procurement documentation about our attitude to modern slavery and human trafficking and our requirements of our suppliers which ensures any new suppliers meet our criteria;
- Introduced a due diligence statement which includes Modern Day Slavery confirming they comply with our criteria;

- Included a clause in our recruitment agency contracts regarding the obligation of our agencies and ourselves under the Modern Slavery Act 2015; and
- Ensured that all our managers and procurers are aware of and commit to delivering our policy and approach concerning modern slavery and human trafficking.

Our Training

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, all Managers have been briefed on the subject. Through our Safeguarding training, which every member of staff undertakes regularly, we make staff aware of the risks of modern slavery in our business. All staff are encouraged to identify and report any potential issues and we have in place protection for whistle blowers

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 2018/19.

A handwritten signature in black ink, appearing to read 'Paul Jennings', is written over the printed name and title.

Paul Jennings
Chair of Trustees
For and on behalf of the ExtraCare Charitable Trust

16 September 2019

