

Modern Day Slavery Act

2020 Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the The ExtraCare Charitable Trust during the year ending 31 March 2020 to prevent modern slavery and human trafficking in its business and supply chains. The publication of this statement has been delayed due to operational pressures caused by the Coronavirus pandemic.

Introduction

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

The ExtraCare Charitable Trust (ECCT) are aware that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global and growing issue existing in all economies from developing to fully industrialised and in all sectors including food production and processing, construction, hospitality, manufacturing, shipping and transportation. No sector or industry can be considered immune or untainted.

ECCT recognise the responsibility to be alert to the risks within the organisation and within the supply chain. ECCT have a zero tolerance approach to Modern Slavery within the supply chain and are 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 is not taking place anywhere in our supply chains or in our business. Staff are expected to report concerns, using the appropriate reporting channels, and management are expected to act upon them.

Our Structure

ExtraCare is a registered charity established in 1988 operating wholly in the UK. We are a not for profit charitable trust and a company limited by guarantee (registered in England under company number 2205136); a registered provider of social housing (4706) and a registered provider of social care. providing homes, care services and healthy lifestyles for older people. 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.

Our Vision and Mission

Our vision is better lives for older people and our mission is creating sustainable communities that provide:

- homes older people want
- lifestyles they can enjoy, and
- care if it's needed.

To deliver our vision and mission we essentially do three things: we develop new villages, we operate villages and schemes, and we support our villages, schemes and our 'extra-care' model through fundraising, advocacy and research.

Our Business

We operate 20 retirement communities (15 retirement villages and 5 smaller housing schemes) across 11 local authorities in the UK, comprising over 3,900 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.

Each of our 20 village and schemes has 5 to 18 social, health and leisure facilities that are accessible to our residents, volunteers and local people representing all age groups living in surrounding communities. We operate a chain of Charity Shops which help fund care and well-being services for older people living at our each of our locations.

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 employ 1,307 employees and are supported by 2,169 volunteers.

The combined annual turnover of the group for the year ending 31 March 2020 is £44.2 million.

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 1140 suppliers, which range from small, local suppliers to large multi-national suppliers. Within our supply chain three suppliers are based outside of the United Kingdom, one in Ireland, one in Germany and one in the Netherlands.

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.

We have a Policy Framework which sets out respective responsibilities for the drafting, review and approval of ECCT's strategies and policies. This provides a structured framework in order to meet ECCT's vision, mission, values and strategic objectives, whilst reflecting current legislation and regulation, internal compliance requirements and the needs of its various stakeholders. Policies are approved by the Board, by Board Committees or by the Executive Team as appropriate and in accordance with the Policy Framework.

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 Policy;
- Community Charter;
- Corporate Social Responsibility;
- Procurement Policy;
- Contract Management Policy;
- Recruitment Policy;
- Agency Worker Regulations, and
- Whistleblowing Policy.

Our Whistleblowing Policy was updated in 2019/20. This encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated, and appropriate remedial action taken.

Our Supplier Due Diligence Processes

Our Procurement documentation includes a reference to the Modern Slavery Act 2015 and all new suppliers are required to complete and 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.

To ensure our contractors and all those in our supply chain comply with our values and ethics, as part of our due diligence exercise, all new suppliers must confirm they comply with the Modern Slavery Act 2015. Suppliers who breach these obligations will face appropriate actions which could include termination of their contract. In 2019/20 all our 149 new suppliers confirmed compliance with the Modern Slavery Act 2015.

Our recruitment Agency contracts include a clause regarding the obligation of our agencies and ourselves under the Modern Slavery Act 2015.

We have ensured that all our managers and procurers are aware of and commit to delivering our policy and approach concerning modern slavery and human trafficking.

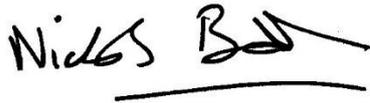
Our Training

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, all our Managers have been briefed on the subject. We make staff aware of the risks of Modern Slavery through our mandatory Safeguarding training which has historically been delivered face to face. In 2019/20 we issued an online mandatory safeguarding course to all staff through our

e-learning portal. Mandatory safeguarding training is completed by all new starters and location staff refresh this training every 18 months.

Effectiveness in Preventing Modern Slavery

We understand that Modern Slavery risk is not static, and we will continue to review and assess our approach to mitigating the risk in the year ahead.

A handwritten signature in black ink that reads "Nick Baldwin". The signature is written in a cursive style and is underlined with a single horizontal line.

Nick Baldwin
Chair of Trustees
For and on behalf of the ExtraCare Charitable Trust