

Modern Slavery Act: 2021 Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by The ExtraCare Charitable Trust during the year ending 31 March 2021 to prevent modern slavery and human trafficking in its business and supply chains. The statement is reviewed and formally approved by the Board annually.

Introduction

Modern slavery is defined as the recruitment, movement, harbouring or receiving of people using force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

Slavery and forced labour (as defined by Article 4 of the Convention on Human Rights) are rightly treated as offences and we recognise, in determining whether 'slavery' or 'forced labour' situations exist, that account must be taken of all the circumstances of the case including the vulnerability of the individual.

Human trafficking is a form of modern slavery and is the movement of people by means such as force, fraud, coercion or deception, with the aim of exploiting them. Human trafficking does not always involve international transportation, and includes commercial, sexual and bonded labour.

Criminal exploitation is a lesser known type of modern slavery and human trafficking that encompasses acquisitive crimes such as forced begging, forced theft (including shoplifting and pickpocketing), as well as cannabis cultivation and financial exploitation.

We 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 and we have a moral duty to do what we can to ensure that we are not complicit, as far as we can reasonably do so.

We recognise the responsibility to be alert to the risks within our Charity and within our supply chain – our contractors, sub-contractors, other suppliers and sub-suppliers etc. We have a zero-tolerance approach to modern slavery within the supply chain. We 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 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 three Executive Directors. Our Trust has a wholly-owned

subsidiary, ExtraCare Retail Limited, which operates more than 40 charity shops. The work of the shops is overseen by its Board of Directors which includes three independent non-executives, including one of ExtraCare'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 21 retirement communities currently housing 4,404 residents (as at 31st March 2021) living independently in our accommodation. These communities vary in size from 40 to 327 properties. Thirteen locations are fully owned by ExtraCare; the remaining eight locations are run in partnership with other housing providers. Our communities are of mixed tenure (available for leasehold, shared ownership, and rental), offering a range of care and support for those who need it, and a vibrant, activity based, healthy lifestyle. Each of our villages and schemes has a range of social, health and leisure facilities that are accessible to our residents, volunteers and local people representing all age groups living in surrounding communities. To support the Charity's vision we have a subsidiary, ExtraCare Retail Ltd, which donates its profits to the Charity and further income is raised through fundraising. We work with our construction partner to build and commission new villages with our latest developments being Solihull village and an extension at our Earlsdon Park Village. 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 1,293 people and are supported by 2,231 volunteers (figures at 31st March 2021). The combined annual turnover of the group for the year ending 31 March 2021 is £41.7 million.

Our Supply Chain

We are engaged in a wide range of activities including construction, housing and facilities management, delivery of social care, procurement of agency staff, catering, cleaning and retail and therefore have a diverse supply chain with over 837 suppliers, which range from small, local suppliers to large multi-national suppliers. Our recent development phase has now been completed and we have no major construction activities underway. Within our supply chain one supplier is based outside of the United Kingdom, namely the Republic of Ireland.

Our procurement activity is currently governed by the Public Contracts Regulations 2015 and our own internal Financial Regulations and Procurement Policy, which require a formal quotation or tender process for all higher value purchases. At supplier set up and/or tender stage (as appropriate), bidders

and/or suppliers are asked to confirm their compliance with the Modern Slavery Act 2015 (if applicable). Furthermore, as part of our tender processes, we require suppliers to ensure that their subcontractors are aware of and comply with the terms of the original contract with ExtraCare.

At present our processes do not include a review of who our contractors and suppliers buy from. We do not believe that it is either practically or economically feasible for us to do so in respect of many of the small companies we work with. We also do not believe that those smaller suppliers have sufficient 'leverage' to determine outcomes down the chain. However, we shall review this approach in the forthcoming year to ensure that we have a clear and documented risk-based approach.

Our agency staffing contracts include a clause regarding the obligation of such agencies and ourselves under the Modern Slavery Act 2015. In the forthcoming year we plan to update our standard contract terms and will include an explicit statement around modern slavery.

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 reviewed our existing policies and procedures and are confident that our policies and procedures promote our values and behaviours both amongst colleagues and within our supply chain, and that these ensure we conduct business in an ethical and transparent manner. Our policies include:

- Procurement – all procurement activities within the Charity must be compliant with Public Contract Regulations 2015, the Modern Slavery Act 2015, and UK Law;
- Whistleblowing – this ensures that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal. Any reports made are fully investigated and remedial action taken where appropriate;
- Recruitment – we take steps to ensure that all our employees are eligible to work in the UK, either as part of our own recruitment process for directly employed staff or through agency processes. We also carry out right to work and Disclosure and Barring Service (DBS) checks where required; and
- Health and Safety – this policy sets out our approach to ensure we provide a healthy working environment for our staff and contractors that work out of our premises.

We do not have a specific policy on modern slavery and human trafficking. However, we shall be reviewing this in the forthcoming year and will expand our Human Rights Policy to include modern slavery and human trafficking.

Our Supplier Due Diligence Processes

Our procurement strategy, policy and supporting documentation ensure that prospective suppliers are subject to an appropriate and proportional vetting process before being engaged. When a new supplier is set up for ExtraCare, they are required to complete a registration form which includes a declaration of conflict of interest, qualification and certification checks, proposed spend per annum, insurance and credit checks as well as gathering information on anti-tax evasion, modern day slavery and understanding of GDPR. All new suppliers are required to complete and confirm compliance with

the Modern Slavery Act. In 2020/21 48 new suppliers confirmed compliance with the Modern Slavery Act 2015. Our due diligence processes ensure that we are able 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.

Our Training

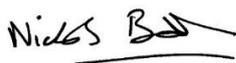
All members of the Procurement Team are MCIPS qualified (or working towards) and are required to take the CIPS ethical procurement and supply training annually. This aims at ensuring procurement activity minimises any negative impact on human rights and the environment whilst endeavouring to maximise value and service. We continue to provide mandatory safeguarding training via e-learning training which includes modern slavery – this is required to be completed every 18 months. We believe that by completing this training, employees will gain a wider knowledge of modern slavery and human trafficking and enable them to recognise potential areas of risk within the workplace. In addition, a further elective e-learning course specifically focussed on modern slavery is now provided to our staff.

Grievances or Complaints Received

There were no grievances or complaints related to modern slavery or human trafficking during the financial year to 31 March 2021.

Future Steps

We understand that modern slavery risk is not static, and we will aim to align our policies and procedures on modern slavery and human trafficking with best practices and changes in legislation. We will continue to review and assess our approach to mitigating the risk of modern slavery in the year ahead.



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