

Modern Slavery Act: 2023 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 (the Charity) during the year ending 31 March 2023 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 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, as well as legal, 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 38 charity shops and whose work is overseen by its Board of Directors, 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 Charity

We operate 20 retirement communities currently housing 4,653 residents (as at 31st March 2023) living independently in our accommodation. These communities vary in size from 40 to 327 properties. Fourteen locations are fully owned by ExtraCare; the remaining six 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 operate a subsidiary, ExtraCare Retail Ltd, which donates its profits to the Charity and further income is raised through fundraising. The operations and development teams are supported by a range of business-support functions including Finance, Procurement, IT and HR. We employ 1,238 people and are supported by 2,071 volunteers (figures at 31st March 2023). The combined annual turnover of the group for the year ending 31 March 2023 is £51.2 million (figures subject to audit).

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 900 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 in the Republic of Ireland and our retail subsidiary source sundry items for resale from overseas.

Our procurement activity is currently governed by the Public Contracts Regulations 2015 and our own internal Financial Regulations and Procurement Policy. 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 subcontractors are aware of /comply with the terms of the contract with ExtraCare.

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, volunteers, and Trustees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal;
- Human Rights Policy – this provides a framework to ensure all employees, workers, volunteers, and contractors follow the legal obligations set out in the Human Rights Act 1988, The Modern Slavery Act 2015 and the Equality Act 2010;
- Recruitment – we take steps to ensure that all our employees are eligible to work in the UK as part of our own recruitment process for directly employed staff. 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.

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. We use the Crown Commercial Service Standard Selection Questionnaire template as part of our tender documents which requires organisations to self-certify whether they are a relevant commercial organisation as defined by the Modern Slavery Act 2015 and if so, whether they are compliant with the Act's annual reporting requirements. All new suppliers are required to complete and confirm compliance with the Modern Slavery Act. 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

We provide mandatory face-to-face safeguarding training to all staff which includes modern slavery. 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. A further elective e-learning course specifically focussed on modern slavery is also provided to our staff. 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 to ensure that any procurement activity minimises any negative impact on human rights and the environment whilst endeavouring to maximise value and service.

Grievances or Complaints Received During the Year

There were no grievances or complaints related to modern slavery or human trafficking received.

Future Steps

We have a couple of actions to progress in terms of procurement/contracting:

1. To provide assurance on the consistency of controls with respect to use of agency staff, we will be procuring a centralised neutral vendor for future agency recruitment;
2. We currently do not believe that smaller suppliers have sufficient 'leverage' to determine outcomes down the chain and nor do we believe that it is either practical or economically feasible for our approach to include these. However, we will review our contract management policy and process during the forthcoming year. This will include:
 - a review of our approach to the review of who our contractors and suppliers buy from; and
 - our approach to sundry transactional purchases for resale by our retail subsidiary from overseas.

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.

A handwritten signature in black ink, appearing to read 'Nick Baldwin', with a horizontal line underneath.

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