**Modern Slavery Act: 2024 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 2024 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 36 charity shops and whose work is overseen by its Board of Directors, including two 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 4,727 residents (as at 31st March 2024) 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 1,351 people and are supported by 2,109 volunteers (figures at 31st March 2024). The combined annual turnover of the group for the year ending 31 March 2024 is £65.1 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 450 suppliers, which range from small, local micro enterprises, SMEs (small to medium enterprises), large corporates and PLCs. 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 and goods for resale from overseas including the Far East.

Our procurement activity is currently governed by the Public Contracts Regulations 2015 soon to be updated to the Procurement Act 2023 and our own internal Financial Regulations and Procurement Policy. At supplier set up and sourcing and selection (as appropriate), bidders of future supplies are asked to confirm their compliance with the Modern Slavery Act 2015. Furthermore, as part of our tender processes, we require suppliers to ensure that subcontractors are aware of and comply with the terms of the contract with ExtraCare. Supplier Code of Conduct.

**Our Policies**

We have zero tolerance to modern slavery and human trafficking, and we are committed to ensuring that modern slavery legislation is adhered to by our suppliers in accordance with our Supplier Code of Conduct. We are confident that our policies and procedures promote our values and behaviours both amongst colleagues and within our supply base and that these ensure we conduct business in an ethical and transparent manner. Our policies include:

* Procurement – all procurement activities within the Charity are compliant with Public Contract Regulations 2015, the Modern Slavery Act 2015, and other relevant legislation and regulation;
* Whistleblowing – this encourages employees, volunteers, and Trustees to raise concerns about how colleagues are being treated, or practices within our business or supply base, without fear of reprisal;
* Safeguarding – this is committed to ensuring the principles of safeguarding adults and children are embedded into all aspects of ExtraCare’s practice;
* 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 compliance process dependent on the size of the supplier and the type of goods or services being procured . All new suppliers are required to confirm compliance with the Modern Slavery Act amongst other relevant legislation as part of the Supplier Code of Conduct. Our due diligence processes ensure that we are able to:

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

**Our Training**

We provide mandatory safeguarding training to all staff and to all volunteers in our schemes and villages which includes modern slavery, and an elective e-learning course specifically focussed on modern slavery. By completing this training, employees are able to gain a wider knowledge of modern slavery and human trafficking and recognise potential areas of risk within the workplace.

**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 which will provide further assurance on our Modern Slavery Act compliance:

* We will explore using a new Managed Service Provider to provide agency staff and modern slavery assurance will form a key part of the contract; and
* We will review our approach to sourcing goods for resale from the Far East by our Retail subsidiary.

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.

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**Nick Baldwin CBE**

**Chair of Trustees**

For and on behalf of the ExtraCare Charitable Trust