



# Modern Slavery & Human Trafficking Policy

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## **INTRODUCTION**

Slavery and human trafficking remain a hidden blight across our society, and as an organisation, we remain committed to responsible recruitment and careful selection of our suppliers and contractors in our supply chain to ensure that all goods and labour are sourced from respectable supply chains.

This statement sets out Care & Repair Leeds actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during a financial year.

Staff are expected to report concerns or questions immediately to management who will act upon them straight away.

## **ORGANISATION'S STRUCTURE**

Our work involves providing our clients with a personal service tailored to meet their needs through the variety of services we offer, and our aim is to ensure our clients are fully satisfied with the services we provide at all times.

We have been operating for over 34 years and have established an organisation with a reputation for cost-effective, quality services. This has enabled steady growth in a competitive market and ensured the highest levels of customer satisfaction. Day to day management is also assisted by a management team.

Care & Repairs' work only extends to the UK marketplace.

Although the organisation's turnover is significantly below the threshold for legal publication of a Modern-Day Slavery Statement, Care & Repair Leeds wants to be pro-active and responsible as a member of potential supply chains to organisations that do turnover in the excess of £36 million, e.g., Leeds City Council.

## **OUR BUSINESS**

Our business is focused around promoting independent living and choices for older people and disabled people throughout Leeds and our aim is to prevent admissions to residential care or hospital, promoting dignity and choice for individuals and empowering people to live safely and securely within their own homes and communities.

## **OUR SUPPLY CHAINS**

Our supply chains include:

- Contractors carrying out major adaptation works and Home Plus works
- Nottingham Rehab Services
- Huws Gray (Milford Building Supplies)
- Solon Security
- Marshall Woolridge
- Yorkshire Water
- Opus Energy
- Amazon

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **RELEVANT POLICIES**

The organisation has the following additional policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

#### Whistleblowing policy

The organisation encourages all its workers, clients, and other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.

#### Employee code of conduct

The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

#### Supplier code of conduct

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of any contract and the business relationship.

#### Recruitment and Agency worker policy

If required, the organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk –

- We ensure that all new supplier initiatives are overseen by the Chief Executive.
- We ensure that where possible we build long standing relationships with local suppliers.

- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch, and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

## **CONTRACTOR / SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. A number of our suppliers will have turnovers in their own right which trigger a requirement to comply with the obligation to produce a Modern Slavery and Human Trafficking statement under the Act. In any event, we actively encourage all of our suppliers notwithstanding the contents of the Act to ensure that they comply with the spirit and intent of the Act.

To ensure that members of our supply chain comply with our values, our Code of Conduct is sent out on an annual basis requiring companies to confirm their commitment. Any contractor or supplier who is found to have a Modern Slavery noncompliance, will be expected to produce an action plan to rectify within an agreed timeframe. This plan is to set out the steps that the supplier or contractor will undertake to rectify the breach. Should the corrective action plan not rectify the breach and depending on the severity of the breach, we reserve the right to terminate any contractual relationship that exists.

## **TRAINING**

To ensure a good level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to members of the management team. We have also taken the decision that all members of staff will undertake awareness training.

## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We will continually monitor our adherence to this policy by self-assessment and discussions with our supply chain.

## **CONSISTENT WITH OUR RISK BASED APPROACH WE MAY REQUIRE:**

Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Practice. Suppliers/Contractors engaging workers through a third party to obtain that third parties' agreement to adhere to the Code. As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.

If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

## **Policy Review Arrangements:**

This Policy will be reviewed after 3 years, or sooner if required by changes in legislation.

**References:** Whistleblowing policy; Employee code of conduct; Supplier code of conduct; Recruitment and Agency worker policy

**APPENDICES:**

- Information supported by LCC and Guardian Support
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