

#### THE ABBEYFIELD SOCIETY

# **ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021**

We are committed to improving our practices to combat slavery and human trafficking.

### **Organisation's structure**

We are a provider of supported sheltered housing, residential care homes and care at home services for older people. We have over 1200 (full time equivalent) employees and operate within the United Kingdom. We have an annual turnover of £48,100,000.

The Abbeyfield Society also acts as the representative body for over 140 independent member societies (in the United Kingdom and internationally) which have their own governance structures.

#### Our business

Our business is organised into three regions (North, West and East) with a Head Office based in St Albans.

## Our supply chains

Our supply chains include food, consumables, utilities and agency workers. We also sub-contract labour through the acquisition of services relating to property construction and ongoing maintenance and repair.

#### 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 Anti-slavery Policy (which can be found on our website) reflects our commitment to acting ethically and with integrity in all our business relationships and to identifying areas of risk and working with our suppliers to eliminate modern slavery from our supply chains.

We have reviewed and refreshed our Whistleblowing Policy - we encourage all our workers to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to ensure that workers can raise concerns with Abbeyfield without fear of victimisation, subsequent discrimination, disadvantage or dismissal. It is also intended to encourage and enable workers to raise serious concerns within Abbeyfield in the knowledge that those concerns will be taken seriously and investigated appropriately. In addition to the internal routes for raising a concern, the whistleblower may seek advice from Protect, an independent charity offering



confidential advice and support to anyone concerned about wrongdoing or malpractice at work and are unsure whether or how to raise it.

We have launched the Abbeyfield Behaviours which make it clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour.

#### Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we also have in place systems to:

- Review central government guidance on occupations most at risk
- Analyse our supply chains in order to identify areas of high risk
- Ensure that all potential and existing suppliers are aware of our policy relating to modern slavery
- Undertake to only contract with those organisations whose approach to modern slavery coincides with our own
- give us visibility of all recruitment in The Abbeyfield Society through the implementation of an Applicant Tracking System which automates our end to end recruitment process.

#### Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- On appointment of a new supplier, ensuring that our Modern Slavery Policy is clearly and effectively communicated.
- All new suppliers evidencing commitment to eliminating modern slavery from their supply chains prior to commencement of contract.
- Continuously monitoring of our supply chains and reviewing suppliers' policies towards modern slavery through the ongoing contract management process.
- Working with our suppliers to ensure that any areas of concern are identified quickly and remedial measures are implemented effectively and as a matter of urgency.
- We will not hesitate to report such offences against the Act to the relevant legal enforcement agencies.



- As a minimum requirement, we would expect all our suppliers, their agents and sub contractors to adhere to the following code of conduct:
  - All workers to be paid the prevailing minimum wage applicable to the location in which
    they are employed. All wages to be payable in full, excluding deductions, unless
    expressly agreed with the worker.
  - All workers to have a contract of employment, setting out terms and conditions of employment, working hours and grievance procedures.
  - Working conditions and safety provisions should be regularly inspected by our supplier or their agent to ensure the health and safety of workers.
  - A worker's documents will remain their property and are not to be retained by their employer: all workers shall be free to leave at any point.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

#### **Further steps**

Following a review of the effectiveness of the steps we have taken to ensure that here is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

We will increase the number of areas which are put out to formal tender to ensure that suppliers are under contract and bound to adhere to modern slavery policies.

We will nurture existing supplier relationships in high risk areas with the aim of reducing reliance on products or services where geographical location or occupations are susceptible to modern slavery.

We will review operational processes with the aim of reducing the number of temporary workers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2021. It was approved by the Board on 10 August 2021.



Ian Plaistowe

The Abbeyfield Society

Date: 10 August 2021