

## MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

### Introduction

This statement is published in accordance with the Modern Slavery Act 2015 and the Modern Slavery Act (Transparency in Supply Chains) Regulations 2015. It sets out steps taken by Brandon Trust during to prevent modern slavery and human trafficking in its business and supply chains.

### Organisational Structure and Supply Chains

Brandon Trust is a charity supporting adults and children with learning disabilities and autism. We support more than 1,500 adults and children across the South of England in 15 Local Authorities and manage a skilled staff of over 2,300 individuals. Our annual income from these services is £50.5m. The organisation currently operates solely in the UK.

In the past year we have performed a risk assessment to establish which elements of our supply chain are most at risk from modern slavery. These higher-risk supply chain areas are currently identified as:

- Agency staff providers,
- Large IT equipment and service contracts; and,
- Building, cleaning, maintenance contractors.

### Policies, Controls and Governance

Brandon's Board of Directors have approved a series of enhanced organisational controls and policies to specifically address Modern Slavery risks, including:

- **Recruitment Policy:**
  - Enhanced to cover right to work assurances.
  - Inclusions of investigations/due diligence in relation to known or suspected instances of slavery and human trafficking.
  - Mandatory training for staff to better understand and respond to the identified slavery.
- **Procurement Policy (including Agency Workers)**
  - Regular Supply Chain risk mapping.
  - Increasing our use of approved Supplier lists.
  - Annual compliance audits for high-risk suppliers.
  - New approvals subject to Modern Slavery assurances – with any identified issues directly audited.
  - Non-conformant Suppliers will ultimately be placed on stop.

- **Whistleblowing Policy**

- Formal process such that staff can report any concern related to the Modern Slavery in the organisation or supply chain.
- Designed to facilitate easy and anonymous disclosures.

- **Code of Conduct**

- Addition to our simple and effective practice guide to explain and reinforce modern slavery risks and mitigations.

### **Monitoring Effectiveness**

In order to ensure that our policies are effective, we track changes in risk assessments and policies/controls, and any suspected instances of Modern Slavery are logged, investigated thoroughly and reported to the Chief Executive.

**Signed: Sue Porto, Chief Executive**

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**Signed: Bonnie Dean, Chair of the Board**

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**Date: 22 November 2018**