

**Modern Slavery Statement**

Modern slavery is a serious crime that violates human rights by depriving a person’s liberty in order to exploit them for personal or commercial gain. Modern slavery is a hidden issue and takes on various forms, including forced and compulsory labour, and human trafficking. The United Nations International Labour Organisation estimates that there are [49.6 million](https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm) people living in modern slavery around the world.

As an ethical and socially responsible health and social care charity we are committed to:

* Responding to modern slavery where we encounter it in our service operations.
* Ensuring that our core activities and supply chains are free of slavery and human trafficking as defined by the [Modern Slavery Act 2015](https://www.gov.uk/government/collections/modern-slavery).

We have created this document, in line with the requirements of the [Modern Slavery Act 2015](https://www.gov.uk/government/collections/modern-slavery), to:

* Provide a modern slavery and human trafficking statement for our activities April 2022 to March 2023.
* Outline our aims for April 2023 to March 2024.

**Contents**

[**1.** **Our governance structure** 1](#_Toc144752040)

[**2.** **Policies** 2](#_Toc144752041)

[**3.** **Procurement** 3](#_Toc144752042)

[**4.** **Safeguarding** 3](#_Toc144752043)

[**5.** **Next steps** 4](#_Toc144752044)

[**6.** **Information about this document** 4](#_Toc144752045)

[**7.** **Document history** 5](#_Toc144752046)

# **Background**

We are a health and social care charity which supports people whose lives are impacted by drug and/or alcohol use. Our name has changed over the years, however our overall mission has always been to help people change the direction of their lives, grow as individuals, and live life to its fullest potential.

Our approach to supporting people began with the recognition that social problems perpetuate cycles of poverty and embed inequality. While we started as a small volunteer-led Sussex-based organisation focused on providing accommodation, we have since grown into a nationwide charity that helps tens of thousands of people each day.

We recognise that we are not in control of everything that impacts upon the people who use our services. However, we are in control of how we respond, and where we focus our expertise, resources, and energy. We seek to embed the values of ‘openness, boldness, and compassion’ in all that we do and are committed to

ensuring our supply chains are free of modern slavery and that we respond to modern slavery where we encounter it in our service operations.

# **Organisation structure**

The Directors and Trustees of Change Grow Live are responsible for all actions carried out by our staff and volunteers. This responsibility encompasses trusteeship of large sums of money from commissions, and provision of services in England and Scotland.

As an organisation we:

* Employ 5139 staff
* Have 1078 volunteers
* Have a turnover of £284 million

The Board of Trustees is responsible for:

* Agreeing our overall strategic direction and is our highest decision-making body.
* Ensuring we are effective in working towards achieving our vision, using our resources to maximum effect, and upholding our fundamental principles and values.

The board works closely with the Executive Leadership Team (ELT), which is responsible for the day-to-day management of the organisation, and is led by our Chief Executive.

Together, the Board and ELT approve and oversee the implementation of our corporate strategy, including managing the governance of the organisation through our policies and procedures which set out a clear framework for our activities and services.

Our annual Modern Slavery Statement is signed off by our Board of Trustees.

# **Policies**

Our policies and other documents are an essential part of our organisation. They provide important information regarding how we act out our mission, our values, and comply with laws and regulations.

* Our safeguarding documents support the delivery of safe and effective services, including ensuring our people understand what is required of them in relation to identifying and referring concerns regarding modern slavery and human trafficking. Please see our section on [Safeguarding](#_Safeguarding) for more information.
* Our procurement documents ensure our people understand the specific risk of modern slavery and trafficking in our supply chains or in any part of our work. Our procurement documents help guide our decision making when considering ordering from, or working with, organisations. Please see our section on [Procurement](#_Procurement) for more information.

Our governance process outlines how we create, update, and review such documents to ensure they are accurate, accessible, and meet clear internal and external standards.

# **Procurement**

Our supply chains cover a wide range of categories which have been risk assessed for the potential for modern slavery in the supply chain. The categories identified as being at high risk from modern slavery are:

* Construction
* Facilities Services
* Food Supplies
* ICT Equipment
* Staffing Agencies

We have a Procurement Policy and a Procurement Strategy that takes into account Modern Slavery risks and the Modern Slavery Act. This applies to, and is implemented by our central Procurement Team who work to manage our suppliers for programmes and operations.

As part of our Procurement Strategy 2021- 2024 we have sought to:

* Ensure procurement is aligned to organisational strategy, objectives, values, and ethics.
* Contribute towards the Social Value objectives of the organisation and comply with the principles of the Social Value Act 2012. We have recently joined [Social Value UK](http://www.socialvalueuk.org/) as a pioneer member, giving us access to a large network of Social Value experts, training resources and events which will support us to raise our profile, knowledge and experience in this area.
* Ensure all products entering the organisation have been procured, delivered, and manufactured in an ethical manner.
* We seek to ensure subcontract arrangements with other charities to deliver on our behalf provide a Living Wage.
* Vet new supply sources and ensure best practice is applied to all supplier relationships.
* Introduce site visit audits that include looking for indicators of modern slavery – such as forced labour. None have been identified to-date.
* Introduced category management templates to support with the end-to-end procurement lifecycle. This includes templates for procurement strategies and specifications. Modern Slavery is one of the sections on this documentation, meaning everyone has to consider this as a part of the planning and management of their procurements.
* For the cleaning contracts we manage centrally, it has been agreed that Change Grow Live will support the suppliers in paying their cleaners the Living Wage.
* Regular contract review meetings are in place for the national contracts.
* More governance has been introduced for the contracting of national contracts (e.g., recommendation papers/ single tender waivers) that are reviewed and approved by the Chief Finance Officer.
* Collect modern slavery statements for all suppliers annually (for national contracts).

# **Safeguarding**

Our safeguarding processes help us prevent, and respond to concerns about, harm, neglect, and abuse. In the last twelve months, 357 people using our services have been identified as having modern slavery risk indicators.

As part of our safeguarding governance we:

* Have a weekly safeguarding surgery where Designated Safeguarding Leads (DSLs) can discuss and receive guidance regarding safeguarding concerns, including modern slavery.
* Carry out risk assessments of people using our services where there are concerns about modern slavery.
* Our DSLs:
* Ensure safeguarding is embedded in all staff and volunteer recruitment processes by fully briefing local recruiting managers.
* Provide advice and support around safeguarding children and adults at risk.
* Ensure all staff in their area receive any update information regarding safeguarding.
* Make, or support staff to make, child protection or child in need referrals.
* We have a modern slavery and human trafficking page on our intranet which provides:
* Links to Home Office guidance
* A staff briefing.
* A Modern Slavery Toolkit.
* Bitesize learning which can be delivered in services.
* We have mandatory Safeguarding e-learning for all staff as well as Modern Slavery e-learning.
* Work with organised crime units to share learning and improve joint working.

# **Next steps**

We are committed to improving our practices to combat modern slavery and human trafficking. We have identified the following goals for the next 12 months:

* Establish a Modern Slavery Panel which meets at least twice a year to discuss actions relevant to:
* Raising awareness across the organisation.
* Identifying areas for improvement.
* Identifying best working practices.
* Producing materials to be shared within the organisation, including

new modern slavery guidance for our staff and volunteers that aligns with the Home Office Guidance. This guidance will help to raise awareness around modern slavery and support our people to respond if they have concerns about modern slavery in our service operations.

The group will include representation from senior leadership, including Procurement, Safeguarding, Assurance, Finance, Facilities, Legal, Inclusion. This group will be responsible for supporting this statement and ensuring actions are being carried out.

* Increase knowledge and skills relating to the identification, management, and prevention of modern slavery. We aim to do this, in part, by:
* Ensuring that every DSL has completed the Modern Slavery e-learning by April 2024.
* Providing a Continuing Professional Development (CPD) course on modern slavery at regional meetings for DSLs.
* Review and update the following key documents to ensure they include relevant information regarding modern slavery:
* Code of Conduct
* Whistleblowing
* Complaints
* Procurement Policy
* Bribery and Corruption Policy
* In relation to procurement and facilities we aim to:
* Further extend formal contract coverage.
* Increase the number of suppliers subject to due diligence processes.
* Validate supply chains of key suppliers to confirm compliance with the Modern Slavery Act 2015.
* Encourage all our contractors to use sustainable supply chains and ensure all staff are paid correctly consummate with the task in hand.
* Improve arrangements with contractors to ensure supply chains are free from modern slavery.
* Further embed social value criteria and weighting into evaluation processes and procurement decision making.
* Evidence social value delivered by procurement activity.

# **Information about this document**

**Who has written this statement:** Nicola Wendel

**Date of next review:** September 2024

# **Document history**

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