

**Modern Slavery Statement**

Modern slavery is a violation of human rights, involving the deprivation of an individual’s liberty for personal or commercial exploitation. This hidden issue manifests in various forms, including forced and compulsory labour, and human trafficking.

According to the United Nations International Labour Organisation, an estimated 50 million people worldwide are living in conditions of modern slavery.

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

* Addressing instances of modern slavery and human trafficking encountered within our service operations.
* Ensuring that our core activities and supply chains are free from slavery and human trafficking, in accordance with the Modern Slavery Act 2015 and the Human Trafficking and Exploitation (Scotland) Act 2015.

This document has been created in compliance with the requirements of the slavery and human trafficking legislation to:

* Provide a review of our modern slavery statement for our activities April 2024 to March 2025.
* Outline our aims for April 2025 to March 2026.

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# **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 promoting human rights, preventing and responding to slavery, human trafficking, and all forms of exploitation.

We have a zero-tolerance approach towards any involvement in such practices, both within CGL and across our partners, operations and supply chains. We encourage transparency and vigilance within our community and provide channels for reporting any concerns, taking swift and appropriate action to protect those at risk.

# **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 across England and Scotland.

As an organisation we have:

* 6,835 staff
* 1,194 volunteers
* £322 million turnover

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 related documents serve as the foundation of our organisation, providing essential insights into how we fulfil our mission, uphold our values, and comply with legal and regulatory obligations.

* Our safeguarding materials play a pivotal role in facilitating the provision of secure and effective services. They ensure that our team members are well-versed in identifying and addressing concerns related to modern slavery and human trafficking. For additional details, please refer to our [Safeguarding](#_Safeguarding) section for more information.
* Our procurement materials equip our team with a clear understanding of the specific risks of modern slavery and human trafficking within our supply chains and across all aspects of our operations. These materials serve as a compass for our decision-making process when contemplating partnerships with or purchases from other organisations. For further information, please consult our [Procurement](#_Procurement) sections for more information.

Our governance procedure outlines the process through which we generate, revise, and evaluate these documents to guarantee their accuracy, accessibility, and compliance with both internal and external standards.

# **Procurement**

Our business supply chains cover a wide range of services, and we have maintained a focus on the below areas identified as being at high risk from slavery and human trafficking:

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

Our Procurement Policy seeks to uphold responsible procurement processes for goods, works and services that support the moral and ethical treatment of people within the supply chain, to prevent and eliminate slavery and trafficking, in line with Modern Slavery Act (2015) and Human Trafficking and Exploitation (Scotland) Act (2015).

Central services maintain oversight on the wider procurement of contracts and will highlight commercial risks within recommendation papers. Our local services maintain a level of operational independence, and, where necessary, may use local spending to procure services within their local communities. Our operational services assess and monitor slavery and human trafficking risks where this occurs these services.

# **Safeguarding**

Our safeguarding processes help us prevent, and respond to concerns about, harm, neglect, and abuse. **380 people using our services (across 45 local authorities) in 2024-25 have been identified as having a ‘Modern Slavery’ risk indicator** (compared to 390 in 2023-24).

As part of our safeguarding governance we:

* Have twice weekly safeguarding support sessions where staff and volunteers can discuss and receive guidance for safeguarding concerns, including slavery, trafficking and exploitation.
* Hold quarterly National DSL Forums for continued learning, development and updates in relation to slavery, trafficking and exploitation.
* We have a slavery and human trafficking page on our intranet which provides information and resources, and links to external sources including Home Office guidance.
* Have mandatory safeguarding e-learning for all staff, as well as Anti-Slavery and Modern Slavery Act 2015 e-learning modules which staff and volunteers are encouraged to complete.
* Carry out risk assessments of people using our services where there are concerns about slavery, trafficking and exploitation.
* Support services to work with colleagues in organised crime units, sharing learning and improving joint working to improve safeguarding.
* Support our DSLs to:
* Embed safeguarding in all staff and volunteer recruitment processes.
* Provide advice and support around safeguarding children and adults at risk.
* Ensure all staff in their area receive up-to-date safeguarding information.
* Make, and support staff to make, safeguarding referrals for both children and adults affected by slavery, trafficking and exploitation.

# **Review of 2024/25**

In the financial year 2024/25, we committed ourselves to enhancing our strategies to counteract modern slavery and human trafficking. We established specific objectives, the progress of which has been evaluated and summarised below:

* Over the next 12 months we will bring together the Slavery and Trafficking Panel, twice annually. The panel will aim to:
  + Raise awareness across the organisation and ensure we hold an anti-slavery approach in all functions of the organisation.
  + Review the number of people impacted by modern slavery, human trafficking and smuggling, and the forms this takes.
  + Review our relationship with suppliers and subcontractors in relation to modern slavery, human trafficking and smuggling.
  + Identify and share good practice, and to review areas of development, agreeing a plan of support to aid this.
  + Produce materials to be shared within the organisation. For example, guidance for our workforce to support them in identifying and responding safely to modern slavery.

**The panel is now active with commitment across CGL. The panel has reviewed progress from 2024/25, identified areas for improvement, and set commitments for the next 12 months. We've highlighted best practices in safeguarding and supporting individuals accessing our services, and enhanced procurement efforts, including second and third-tier checks and increased social value delivery.**

**With data representation on the panel, we can better track the number of people in Adult Community Services (England) affected, and we are exploring ways to capture this data across other services. Our e-learning courses remain current and fit for purpose, with a new virtual training resource tailored to our work (and recorded a session). Additionally, we've created resources to better understand the National Referral Mechanism and the Action Means Purpose model.**

* Support our DSLs and wider workforce to enhance their knowledge and understanding of modern slavery, human trafficking and smuggling.

**Our National Safeguarding Team have been responsive to our staff and volunteers’ queries and support requests, empowering them to be curious about risk indicators and offering case consultations. They have also delivered training sessions using the new learning resource to increase knowledge.**

* Develop skills to identify, prevent and to safeguard against these risks. Appoint a Modern Slavery Lead within the National Safeguarding Team who will:
  + Build links with Anti-Slavery Networks and bring insights back into CGL.
  + Create a refreshed Continuing Professional Development (CPD) course on modern slavery, to be delivered at the regional forums.

**We have appointed a Slavery Lead within the National Safeguarding Team who is coordinating our panel and associated activities. We have joined two Anti-Slavery Networks and have raised awareness about networks with the wider workforce. Circa 225 people have been trained using the new learning resource, gaining deeper insights into slavery and human trafficking, the correlation to our work and avenues for reporting and seeking support.**

* Improve recruitment processes when using recruitment agencies which will:
  + Develop guidance for managers using recruitment agencies.
  + Develop shared expectations for agencies to adhere to, including safer recruitment practices.
  + Allow recruitment agencies to confirm compliance with the Modern Slavery Act 2015 and to share their Modern Slavery Statement.

**Our HR Team with support from other departments, have created new guidance to be launched in May 2025, to support safer recruitment practices when using recruitment agencies. They have also developed a list of approved agencies and is dedicated to ensuring they are committed to addressing slavery and human trafficking. Our Recruitment Policy has been updated and includes expectations for Recruiting Managers to complete associated training.**

* Review key documents and update them, to ensure they respond to modern slavery, human trafficking and smuggling:
  + Recruitment Policy.
  + Safeguarding Policies and Procedures.
  + Equity, Diversity and Inclusion Policy.
  + Code of Conduct.
  + Whistleblowing Policy.
  + Complaints Policy.
  + Procurement Policy.
  + Bribery and Corruption Policy.

**We have completed a review of several key documents, updating them to ensure they address slavery and human trafficking to guide our staff and volunteers in their day-to-day roles. All of the documents listed above have been completed.**

* In relation to procurement and facilities, we aim to:
  + Further extend formal contract coverage.
  + 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 support supply chains in reducing the risk of modern slavery.
  + Demonstrate the social value achieved through procurement activities.

**Social value scoring’s embedded within tender processes and is a key factor within procurement decision-making. By reducing the number of suppliers we use, we have been able to reduce the risks and increase effective governance of compliance and quality assurance. We’ve implemented social value delivery plans, completed second and third tier checks and created a register to flag when reviews are upcoming, so they are completed in a timely way. Contractors sign up to expectation agreements.**

# **Commitments for 2025/26**

We maintain our long-term commitment to refine our practices so we can improve safety measures for the people we support, our communities and team members. Our dedication serves as the driving force behind our initiatives to both prevent and respond to slavery, human trafficking and smuggling. Our priorities for the next 12 months are:

* Commission an external audit to identify, assess, and document sources of assurance, and to evaluate the effectiveness of governance and risk management related to slavery and human trafficking. Recommendations from the audit will be reviewed and addressed to enhance our assurance framework.
* We will scope the recording and reporting capabilities to track the number of people accessing our services affected by slavery and human trafficking, with the goal of enabling comprehensive reporting across all services.
  + Review the ratio of services that do and don’t have the ability to capture slavery and human trafficking as a risk indicator.
  + Scope out the capabilities of the varying case management systems our services record on.
  + Identify a plan and timeline for adding slavery and human trafficking as a risk indicator data field for services which don’t currently have this.
  + Where CGL doesn’t have the ability to change case management systems (i.e. multi-agency recording systems) we will use our influence to explore possible developments or consider alternative ways of capturing this for those services.

*\*Completion of changes to case management systems are likely to span fiscal years due to the number of services, number of systems and complexities involved in this.*

* We will make information and opportunities for learning available for all staff and volunteers to aid continued learning and support
  + We will update the Slavery and Human Trafficking intranet page to provide a central, easily accessible point of information for all staff, ensuring they can easily find the resources, information, and support they need.
  + We will source a ‘Human Trafficking and Exploitation (Scotland) Act 2015’ e-learning module for our Learning Portal to support the understanding of staff and volunteers in Scotland services and central services supporting them.
  + We will deliver some awareness sessions for key dates, such as Anti-Slavery Day (18 October), to increase insights and ensure the conversation remains continuous and sustained.
  + Share our achievements against 2024-25 commitments, and current slavery and human trafficking activity for ongoing visibility of the workforce.
* Extend and unify our standards when working with supply chains that are sourced centrally or on a local level and improve our outcome measures.
  + Develop guidance on ethical procurement practices, outlining key principles and including due diligence checks to ensure compliance with ethical standards and sustainability in sourcing, when not managed centrally.
  + Procurement to reduce off-contract spending by working with service leadership to improve purchasing practices and compliance with established contracts.
  + Facilities to consolidate suppliers, ensuring streamlined processes and better management of vendor relationships.
  + Facilities to enhance their ability to evidence outcome measures by implementing standardised tracking and reporting methods to monitor and assess performance effectively.

\**Reducing off-contract spending and consolidating suppliers will likely span multiple fiscal years due to the scope of work and the complexities involved.*

# **Information About This Document**

**Who has written this statement:** Bennjoseph Vaughan

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# **Document History**

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