

Brunelcare's Modern Slavery and Human Trafficking Statement for the 2019-20 Financial Year

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps Brunelcare has taken to ensure that slavery or slavery-like practices, forced labour and human trafficking is not taking place in our supply chains or in any part of Brunelcare's business.

Brunelcare's Purpose and Legal Structure

Founded in 1941, Brunelcare is a company limited by guarantee without share capital (*registered company number 601847*) and a registered charity (*registration number 201555*).

The charitable objectives of Brunelcare, as set out in its Articles of Association are

- *the relief of those within the United Kingdom who are in need by reason of age (whether or not that need is exacerbated by ill health, disability and/or financial hardship); and*
- *the relief of those within the United Kingdom who are in need by reason of ill-health, disability and/or financial hardship.*

To fulfill the above objectives, Brunelcare is registered with the Regulator for Social Housing and provides social housing across a range of sites in the Bristol area. It is also registered with the Care Quality Commission as a provider of care homes, extra care housing and a range of community services in Bristol, Somerset and South Gloucestershire. Further details about the [care Brunelcare provides](#) and the types of [housing](#) and the areas where they are provided can be found by clicking on the links highlighted blue or by visiting our [website](#).

Today, across Bristol, South Gloucestershire and Somerset, Brunelcare works to support over 2,000 people to remain as independent as possible, in their communities, for as long as possible.

Care is provided in people's own homes, in five specialist care homes, two resablement facilities and through a day centre.

We offer a complete care and support pathway in our communities. Starting in residents' own homes, right through to our care homes. This means we can offer the best choices for later living, which fit with what residents want or need. We have over 1,000 sheltered homes within 31 sites, with three extra care housing schemes and a retirement village, all within the greater Bristol area.

To deliver all of its vital services Brunelcare employs a dedicated team of 1,200 people.

Our Policy on Slavery and Human Trafficking [Our On-going Commitment to Compliance with the Modern Slavery Act 2015]

The Board of Brunelcare and its Senior Leadership Team 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 commitment is to act ethically and with integrity in all our business relationships and to implement effective systems and controls to ensure slavery and human trafficking is not taking place. We are further committed to making sure that our properties are not used to accommodate the work of human traffickers or detain others for servitude.

As a Registered Provider of social housing and social care services, Brunelcare recognises its duty to combat modern slavery and human trafficking. This statement sets out the steps that Brunelcare has taken to identify and understand all potential modern slavery risks related to the delivery of our services.. It also outlines the measures that have been put in place to ensure that there is no slavery or human trafficking in our own business and supply chains.

All members of the Board of Brunelcare and its employees, including volunteers and contractors, are expected to report any concerns relating to slavery or human trafficking. Any concerns raised will be duly investigated with action taken as necessary.

In addition to the above, Brunelcare requires compliance with Brunelcare's Code of Conduct. In particular, there is an obligation to act with integrity and in accordance with all relevant legislation and statutory requirements. This includes compliance with the Modern Slavery Act 2015.

This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking in our corporate activities and supply chains.

Our principles related to modern slavery and human trafficking

The Board of Brunelcare is committed to:

- protecting the rights of our employees, those employed in our supply chain, and those affected by business;
- acting in a socially responsible manner that complies with applicable laws;
- preventing any form of child labour and is alert to the risks vulnerable individuals may face and seek to ensure they are not discriminated against or exploited, and
- only working with suppliers whose core values matches its own.

Our Approach to Fulfilling the Requirements of the Anti-Slavery Act

In accordance with the Modern Slavery Act 2015, the Board of Brunelcare has put the following measures in place to ensure that Modern Slavery and Human Trafficking does not occur within any part of its supply chain or in any part of our business:

Policies

We continue to regularly review all relevant policies in light of the Act. We are confident that our policies promote good behaviour among our colleagues and within our supply chain.

Brunelcare has the following policies and strategies in place that set out and reinforce its approach to the identification of modern slavery risks and the steps to be taken to prevent modern slavery and human trafficking in its operations:

Employee and Trustees Code of Conduct

Brunelcare's Code of Conduct makes clear to employees and Trustees the actions and behaviours expected of them when representing the Charity. Brunelcare strives to maintain the highest standards of employee and Trustee conduct and ethical behaviour including a mandatory annual declaration of interest from every Trustee, member of the Senior leadership Team and those who can procure services on Brunelcare's behalf.

Whistleblowing (Public Interest Disclosure) Policy

Brunelcare encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the Charity. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. Brunelcare's Confidential Reporting (Whistleblowing) procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Recruitment and Selection Policy

Brunelcare operates a comprehensive and transparent recruitment policy. Brunelcare's approach to recruitment and selection continues to contain relevant requirements in terms of checking of eligibility to work in the UK which is carried out for every successful application as well as reference checks for every new starter.

Safeguarding Adults Policy

Brunelcare's Safeguarding Adults Policy identifies Modern Slavery as a form of abuse and details clear referral methods for staff to follow if and where abuse is suspected.

Declarations of Interest and Gifts and Hospitality Policy

Brunelcare requires all Board members and employees to ensure that good probity is maintained at all times and that our conduct is transparent, effective and beyond reproach. The policy requires Brunelcare to maintain a register of declarations of interest as well as a register of gifts and hospitality.

Procurement and Contract Procedure Rules

Brunelcare is committed to ensuring that its suppliers adhere to the highest standards of ethics. Brunelcare does not wish to support or deal with any business knowingly involved in slavery or human trafficking in any part of its operations.

We are in the process of carrying out a full review of all our procurement policies and procedures to ensure our standards are fully compliant with all relevant legislation including modern slavery and reflecting our zero-tolerance approach to modern slavery and human trafficking.

All our standard contracts will contain clauses and contractual requirements that our suppliers do not engage in any activity that is contrary to the Act. Over time, we will achieve the inclusion of the contractual requirement in all supplier relationships.

A register of all contracts will be maintained by the Corporate Governance Team and all new suppliers will be required to meet our eligibility criteria including modern slavery.

Recruitment of Agency workers

Brunelcare only uses specified, reputable employment agencies and always verifies the practices of any new agency it is using before accepting workers from that agency.

Training

Brunelcare's Director of Human Resources and Organisational Development is responsible for sourcing and making training available on modern slavery and human trafficking to staff. All employees are required to complete an eLearning Anti-slavery workshop and also a suite of safeguarding courses which outline how concerns around criminal and safeguarding matters should be raised and addressed.

Brunelcare's Supply Chains and Associated Risks

The Charity's supply chains are drawn mainly from the construction, property maintenance and adult social care market. Brunelcare has assessed the risks of modern slavery and human trafficking as follows;

High risk activities

Brunelcare does not believe there to be any high risk operations within the work of the company and its supply chain with regards to modern slavery and human trafficking.

Medium risk activities

Supply chains linked to house building and property maintenance, as a result of the organisation's reliance upon external contractors to undertake a high percentage of building and some maintenance work.

Low risk activities

Supply chains in the provision of agency staff predominantly in adult social care.

Reporting

Brunelcare takes all allegations of slavery and human trafficking seriously. As such, the Board encourages the disclosure of information about malpractice/wrongdoing. Any allegations of slavery and human trafficking can be raised in accordance with Brunelcare's Whistleblowing Policy (Public Interest Disclosure)

Investigations/due diligence

Additionally any suspected incident of slavery or human trafficking can be raised directly with the Head of Corporate Governance. Individual members of the Senior Leadership Team, with assistance from Head of Corporate Governance, are responsible for investigating any suspected instances of modern slavery and human trafficking.

Next Steps

Brunelcare will continually review relationships with all suppliers and procurement procedures and will assess any concerns of slavery or human trafficking on a case-by-case basis.

Declaration

This statement has been made in accordance with the reporting requirements of Clause 54, Part 6 of the UK Modern Slavery Act for the financial year ending 31 March 2020.

This statement was approved by the Board of Trustees on 22 September 2020 and applies to all the organisation's activities. It will continue to be reviewed and updated as necessary or, as a minimum, on an annual basis.

Chief Executive Officer:



**Oona Goldsworthy
September 2020**

Chair of the Board:



**Deborah Evans
September 2020**

Note:

Modern Slavery Helpline - call 08000 121 700 to get help, report a suspicion or seek advice. More information can be found on <https://www.unseenuk.org/>

The Safe Car Wash - The Safe Car Wash app is a new smartphone app created and launched by the Church of England's anti-slavery campaign 'The Clewer Initiative' and the Catholic Church's Santa Marta Group to help members of the public alert police to potential incidents of modern-day slavery at hand car washes. You can download the free app onto your smartphone. When you are using a hand car wash, simply open the app and complete a short survey about the working conditions of the car wash.

<https://www.theclewerinitiative.org/safecarwash>