



## Modern Slavery Policy and Statement

### 1. Overview and how we define Modern Slavery

- 1.1 A definition: Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery' – criminal activity that deprives victims of their liberty and usually involves financial and other exploitation.
- 1.2 We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chains. We will not tolerate it.
- 1.3 You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, trustee, consultant, volunteer, supplier or service provider.
- 1.4 Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also involve other legal steps being taken against you.
- 1.5 Our Anti-Slavery Officer ('ASO') is our Chief Executive Officer, Tom Lambert. He is responsible for this policy and for ensuring its review every 2 years minimum.
- 1.6 If you are an employee, this policy does not form part of your employment contract, and we may update it at any time.

### 2. Preventing Modern Slavery in our business

- 2.1 We carry out appropriate checks on all employees, recruitment agencies and suppliers, so that we know who is working for us or on our behalf.
- 2.2 We give every employee a written employment contract, and he or she is paid in accordance with the law. We comply with our legal obligations to ensure the health and safety of all our employees and volunteers, including in relation to working hours, rest breaks and holidays.
- 2.3 All employees are required to sign a copy of this policy to show they have read and understood it. Furthermore, all staff with line manager responsibilities are required to complete a Modern Slavery Act training module and refresh their knowledge on the subject every 2 years thereafter.

Last reviewed: July 2024

Next review date: January 2025



### 3. If you are one of our Suppliers

3.1 If you supply us with goods or services, you must assess your business and supply chains and confirm to our ASO that you:

- Comply with your legal obligations, in relation to Modern Slavery; and
- Are committed to ensuring there is no Modern Slavery taking place in your business, or in any of your supply chains.
- Provide, upon request, a copy of your anti-slavery policy.

3.2 If you breach this policy or are found to have Modern Slavery in your business, or knowingly in your supply chain, we may terminate our contract with you and pursue legal remedies against you.

### 4. If you are an Employee or a Worker providing services for us

4.1 You must immediately report any suspicions of Modern Slavery in our business or supply chains to our ASO. Our ASO will investigate and report to our Board of Trustees within a reasonable time, on actions which may require to be taken.

4.2 You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately tell our ASO and, if you are an employee, refer to our Grievance and Whistleblowing Policies.

## Modern Slavery and Human Trafficking Statement 2024-25 for The Carers Centre for Brighton & Hove

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to minimise the risk of modern slavery in our business and supply chains.

### Introduction

The Carers Centre for Brighton & Hove (hereafter TCC) is committed to preventing slavery and human trafficking occurring in any of its activities. Our commitment is to ensure that those organisations that we actually contract with to receive goods and services are aware of our policies in order to comply with the Modern Slavery Act. This commitment is evident through our company policies, which aim to uphold the highest ethical and professional standards. We ensure the adherence to policy commitments and compliance of current Government legislation and regulations.

Last reviewed: July 2024

Next review date: January 2025



### **Our organisational structure and operations**

TCC is a charity providing information and support to unpaid family/friend carers. TCC employs 25 staff and is supported by approximately 70 volunteers helping to deliver its services. The organisation sub-contracts some project work to other partner charities accounting for around 18% of its turnover. All of our key suppliers and contractors are based in the UK.

### **Our commitment to the principles of the Modern Slavery Act 2015**

TCC is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves and as such the company has an established whistleblowing policy which all staff can access alongside all other company policies on the staff intranet.

Where risk exists in recruitment, our processes are designed to ensure that all prospective employees are legally entitled to work in the UK, and where applicable subject to DBS checks in order to safeguard employees and volunteers from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. Our contracts with our members & customers allow us to terminate for convenience under a wide ranging all encompassing reputational damage contract clause which covers those to be found in breach of the modern slavery act.

Much of the supply chain is engaged on their terms & conditions, although modern slavery and anti-bribery elements are incorporated into the award of new or renewing contracts.

### **Policies relating to slavery and human trafficking**

Our Modern Slavery Policy is posted on the staff intranet together with all other company policies and procedures. It is a bi-annual agenda item for discussion and review with our Board of Trustees. It reflects our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations and acting ethically and with integrity in all our business activities and relationships. All staff with line manager responsibilities are required to complete a Modern Slavery Act training module and refresh their knowledge on the subject every 2 years thereafter.

Last reviewed: July 2024

Next review date: January 2025



Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

### **Current Actions**

We aim to take the following steps over the course of the next review period ending February 2025:

- Sample check TCC suppliers based on their policies and procedures to ensure adherence to the Modern Slavery Act
- Provide access to refresher training to ensure that relevant staff are up to date with the latest on modern slavery and embed as part of their induction processes
- Review achievements against this action list as well as review the Policy and this Statement at our Board Meeting in January 2025

Last reviewed: July 2024

Next review date: January 2025