RECOVERY FOCUS

Group Corporate Policies

Anti-slavery and human trafficking Policy Statement

Our Group is committed to:

- Undertaking and promoting ethical practices and policies to prevent modern slavery and human trafficking;
- Ensuring its clients, workforce and assets are not involved or exploited for the benefit of those involved in such activities; and,
- Providing a full statement as required under the transparency provisions of the Modern Slavery Act 2015

We will take all measures to assist in preventing modern slavery in its activities and supply chain. Modern slavery encompasses slavery, human trafficking, forced labour, debt bondage and domestic servitude and each seeks to deprive an individual of their liberty in order to exploit them for personal or commercial gain

This is our latest statement and has been prepared in line with latest guidance (January 2024) issued by the Home Office under the Act on preparation of such statements and what and how to notify and refer potential victims. It applies to all Recovery Focus partners and is drawn up by the Group Leadership Team (GLT) requiring adoption by each partner board.

Currently within the group, only Richmond Fellowship exceeds the turnover threshold set by the Act and the Modern Slavery Act (Transparency in Supply Chains) Regulations. However, all partners have committed to compliance with the statement. Richmond Fellowship is registered with the Home Office who oversee compliance with the Act.

Our policies, due diligence and risk assessment

The management and refresh of policies across the group remains the over-arching responsibility of the GLT. Policies key to compliance with directors' duties would normally be shared with the relevant board after scrutiny by the Group Board Committee responsible. Procedures (to deliver the policies) are an operational matter and must be fit for purpose for each separate element of the business and are the ultimate responsibility of the relevant lead GLT member identified.

In accordance with the stated ethics and values of the Group, we aim to do thorough due diligence in relation to our employees, volunteers and suppliers to ensure they individually comply with their obligations in respect of Modern Slavery. We understand that the most vulnerable groups are particularly at risk (including refugees, migrant workers, asylum seekers and the homeless).

Specifically, we only use specified, reputable employment and recruitment agencies to source labour and we always verify the practices of any new agency before accepting workers from them. This is reflected in our recruitment and selection policies. Whether employed directly or via a reputed agency, our requirements for starting any role within the organisation is proof of identity and the correct permissions to work and these are confirmed as true and bone fide. We use the Disclosure and Barring Service for all roles that interact with people we support and, in this way, we know who is working within our partners providing our services, many of whom are vulnerable people in their own right.

Employees are provided with clear and transparent information about rates of pay, hours worked and legal deductions. We expect all employees to adhere to the Code of Conduct. We also

regularly review our employment terms to ensure compliance with all relevant legislation including the National Living Wage and other aged related Minimum Wage directives.

Measuring effectiveness and workforce training

We have systems in place to be assured that our procedures are robust (including the use of Internal Audit teams) and we also have an overarching whistle blowing policy to encourage the reporting of concerns whilst protecting whistle blowers.

All of our workforce who are in contact with people using our care and support services are trained to identify all safeguarding issues, which include signs of exploitation, and comply with the referral process to ensure that incidents of this nature are reported to local managers who then work with other agencies such as Local Authority Social Services, local safeguarding teams and the Police.

Our Safeguarding policies include specific guidance on how to recognise signs of abuse, including slavery, human trafficking, forced labour, debt bondage and domestic servitude and how to respond to and escalate any concerns. Alongside our Safeguarding processes, our tenancy and fraud policies (and procedures) enable us to take appropriate action if suspicions of modern slavery are identified.

Supply chains

Our supply chains include the sourcing of products and services important to the delivery of our services. Though not an exhaustive list, our supply chain includes:

- Property related services and materials (construction and maintenance)
- Facilities management, communications and IT equipment services
- Temporary/Agency staff and other professional services
- Utilities provision, office equipment and supplies

In scrutinising our suppliers (and in turn scrutinising their own supply chain) we adopt a risk-based approach to ensure those sectors commonly deemed to be most at risk from Modern Slavery are reviewed in more detail.

Almost all of our procurement activity currently takes place in England although we have a small number of suppliers from within the European Union. We observe current international procurement directives that govern good practice in procurement. This is supplemented by our own Group Procurement Policy which extends across all partners in our group.

Our Group Procurement Policy requires that we commission fairly and equitably and conduct reasonable due diligence prior to entering into supply arrangements. The manager responsible for procurement exercise takes responsibility for these checks.

Our tendering processes ensure we engage with reputable contractors who adhere to all appropriate legislation, regulation and practices. Our contract management arrangements help us ensure they maintain the standards required.

Our internal policies are reviewed on a continuous basis to ensure that they reflect best practice and to mitigate against risks. All managers with delegated authority to commission goods or services will seek to ensure any potential provider promotes ethical practices and policies to prevent modern slavery and human trafficking'

As part of the Group's ongoing activity, we may also review or reconsider additional policies, procedures or requirements if appropriate to ensure there is no slavery or human trafficking taking place in any partner within the Recovery Focus Group or in our group supply chains.

This statement is updated annually.