Modern Slavery and Human Trafficking Statement

Introduction

Modern slavery and human trafficking is incompatible with Shaftesbury's values. We fully support the government's objective to eradicate modern slavery and human trafficking.

The Modern Slavery Act 2015 places a duty on organisations, including our charity, to disclose every financial year the steps being taken to prevent modern slavery organisationally and within its supply chains.

This statement sets out the actions we have taken to understand the modern slavery risks relating to our charity and the steps we have taken to prevent slavery and human trafficking across Shaftesbury, its subsidiaries and its supply chain.

Definition of modern slavery and human trafficking

The Modern Slavery Act 2015 Act categorises offences of 'slavery, servitude and forced or compulsory labour', and 'human trafficking'. These crimes include knowingly holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them during or soon after. Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery or human trafficking without crossing a national border.

Shaftesbury recognises that modern slavery may be present in a range of forms including forced labour, domestic servitude, criminal exploitation, sexual exploitation, county lines activity, cuckooing, financial exploitation and human trafficking.

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About Shaftesbury

Shaftesbury is the disability charity that connects people with their communities. We tackle social isolation and the barriers that can cause this in the lives of disabled and vulnerable people.

Through a wide range of residential/nursing homes, supported living, education, training and community services, we promote inclusion and wellbeing for all. Together, we work to see people take part, contribute and be valued.

We put the elements in place that all add up to connected lives and communities.

Our Ethos

Shaftesbury is committed to improving our practices to ensure that modern slavery does not occur in any area of the charity.

As a charity with a dynamic and inclusive Christian ethos, we take seriously the call to work for a just and equal society, upholding the human rights and values of freedom, respect, fairness and independence for all. We are committed to ensuring the utmost protection and safety of all people in our care and service.

We seek to ensure that our charity values of being 'Open, Enabling, Inclusive and Courageous' are upheld in our duty of care to others.

Our Organisation, Subsidiaries and Supply Chains

Shaftesbury is a charity registered in England, and a company limited by guarantee registered in England and Wales. It is governed by its Articles of Association dated 7 November 2013.

Shaftesbury is the parent charity of a group of charities and operating companies as detailed below:

- At Home in the Community
- John Grooms
- Shaftesbury Icanho Limited

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- Prospects for People with Learning Disabilities
- The Shaftesbury Society

The Board of Trustees is responsible for the ensuring Shaftesbury's compliance with the requirements of the Modern Slavery Act 2015.

Our Delivery

Shaftesbury is a proven and trusted provider of disability care and community projects throughout the UK. We support hundreds of individuals and families through our services in England, Wales and Northern Ireland. These include:

- Residential care homes and residential nursing services for people with disabilities
- A school and several colleges of further education for scholars with disabilities
- Supported living Services for people with disabilities
- Care and support for people with a disability in the community
- Day services for people with disabilities
- A rehabilitation brain injury centre
- A memory and dementia service
- Short breaks for children with disabilities

Our Supply Chain

We use a large number of suppliers to support the activities that we deliver. Having considered arrangements across our supply chain, we regard the following areas as giving rise to the highest risks of modern slavery:

- Use of agency staff in care and education settings; and
- Use of use of cleaning contractors.

We undertake due diligence checks as part of our new supplier process. We will continue to source goods and services from good reputable suppliers where we can check suitability.

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Policy and Controls

We have the following policies in place to manage our risks around modern slavery and outline the steps we take to prevent slavery and human trafficking in our operations.

Whistleblowing Policy – Shaftesbury encourages all stakeholders 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 slavery or human trafficking. The whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of repercussion. Employees, the people we support and their families, and others can contact us confidentially to raise their concerns.

Employee Code of Conduct – Shaftesbury's code of conduct makes clear the actions and behaviour expected of our staff when representing Shaftesbury. We strive to maintain the highest standards of employee conduct, particularly through employee sign-up to our values.

Safeguarding - Shaftesbury's policy set out behaviour, which could give rise to a safeguarding concern, including modern slavery and human trafficking. Staff are trained in safeguarding to ensure they are able to spot and raise concerns.

Safer Recruitment policy – We operate a robust safer recruitment policy, including conducting UK eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Volunteers - Shaftesbury has a Volunteer Policy which ensures that volunteers are aware of our Whistleblowing Procedure and know how to raise any concerns of malpractice.

Shaftesbury's Safeguarding and Child Protection Procedure – provides a link to information from the NSPCC and Gov.uk on Modern Slavery.

Reporting Pathways

What staff should do if they suspect modern slavery:

1. Ensure immediate safety.
2. Report through safeguarding processes.
3. Notify line management.
4. Consider referral to police where appropriate.
5. Consider referral to the National Referral Mechanism (NRM) where applicable.

Shaftesbury will respond to concerns regarding modern slavery using a person-centred and trauma-informed approach, recognising the impact of coercion, control and exploitation on individuals.

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Training

Safeguarding training is mandatory for all staff and volunteers working at Shaftesbury's services. Safeguarding is covered in our induction process, and the substantive safeguarding training includes modules which discuss exploitation, human trafficking, forced labour and domestic servitude.

Staff are required to demonstrate an understanding of:

- Indicators of modern slavery
- Forced labour
- Human trafficking
- Criminal exploitation
- County lines
- Duty to report concerns
- Referral pathways
- Professional curiosity

Risks

The risks around modern slavery are managed within our due diligence practices and our policy framework, and specifically the policies referred to above.

Risks for People We Support

We recognise that there are additional risks to the people we support due to their vulnerability.

Potential indicators:

- Unexplained withdrawal from activities
- Restricted access to money
- Signs of coercion
- Unexplained injuries
- Third parties speaking on behalf of individuals
- Concerns regarding employment arrangements
- Multiple people registered at a single address
- Fearfulness or reluctance to engage

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Assurance and Performance Measures

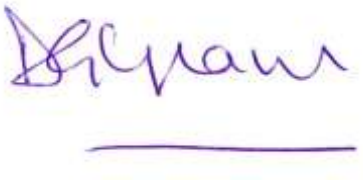
The Safeguarding and Service Committee will monitor:

- The percentage of staff trained to identify modern slavery – Annually
- The number of safeguarding referrals involving exploitation
- Percentage of procurement exercises including modern slavery checks for the identified high-risk supply chains

Further steps to prevent Modern Slavery

Shaftesbury continues to take the issues of modern slavery seriously and will develop our approach, reviewing and revising policies and training where necessary in order to ensure that we raise awareness of modern Slavery throughout the organisation.

This statement is made pursuant to, section 54(1) of the Modern Slavery Act 2015 and has been updated for the financial year ending 31 March 2026.



Duncan Ingram – Interim Chair of Trustees



Sally Chivers - CEO

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Statement Ownership

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