

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 49.6 million people worldwide are experiencing modern slavery.

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

- Addressing instances of modern slavery 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.

This document has been created in compliance with the requirements of the Modern Slavery Act 2015 to:

- Provide a review of our modern slavery and human trafficking statement for our activities April 2023 to March 2024.
- Outline our aims for April 2024 to March 2025.

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1. Background

We are a health and social care charity, which supports people whose lives are impacted by drug and/or alcohol use. CGL's mission is to help people develop positive behaviours, grow as individuals, and live happy, enriching lives.

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 to the needs of those who use our services, 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. We are committed to reducing the risk of modern slavery within our supply chains by proactively responding to allegations with professional curiosity and vigilance.

2. 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 in across England and Scotland.

As an organisation we:

- Employ 6486 staff.
- Have 1145 volunteers.
- Have a turnover of £307.3 million.

The Board of Trustees are 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. It is led by our Chief Executive.

Together, the Board and ELT approve and oversee the implementation of our corporate strategy. This includes management of the organisational governance 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.

3. Policies

Our policies and associated documents form the backbone of our organisation. They offer crucial insights into how we embody our mission, uphold our values, and adhere to legal and regulatory requirements.

- 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](#) section.
- Our procurement materials equip our team with a clear understanding of the specific risks of modern slavery, and trafficking within our supply chains. 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](#) sections.

Our governance procedure outlines the document revision to guarantee their accuracy, accessibility, and compliance with both internal and external standards.

4. Procurement

Our business supply chains cover a wide range of services. We have maintained a focus on the below areas identified as being at high risk from modern slavery:

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

Change Grow Live's Procurement policy strategy considers Modern Slavery risks and the Modern Slavery Act.

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 Modern Slavery and Trafficking risks where this occurs these services.

In relation to procurement and facilities we aimed to:

- Further extend formal contract coverage.
- Increase the number of suppliers subject to due diligence processes.
- 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 commensurate with the task in hand.
- Improve arrangements with contractors to ensure supply chains are free from modern slavery.
- Further embed social value criteria and weighting into evaluation processes and procurement decision making.
- Evidence social value delivered by procurement activity.
- Review and update the following key documents to ensure they include relevant information regarding modern slavery:
 - o Procurement Policy.

Steps have been taken to make progress on the above commitments, namely that social value criteria are now embedded into our tender packs. The policies and procedures remain under review with an aim of the above to include/consider the impact of Modern Slavery within the 2024/25 statement period. During the year 24/25 the Modern Slavery Panel will work closely with colleagues in facilities and procurement to progress on the above commitments.

5. Safeguarding

Our safeguarding processes help us prevent, and respond to concerns about, harm, neglect, and abuse. In the last twelve months, 390 people using our services have been identified as having modern slavery risk indicators.

As part of our safeguarding governance we:

- Have twice weekly safeguarding support sessions where Designated Safeguarding Leads (DSLs) can discuss and receive guidance regarding safeguarding concerns, including modern slavery.
- Have quarterly DSL Forums for continued learning, development and updates in relation to Modern Slavery.

- Carry out risk assessments of people using our services where there are concerns about modern slavery, trafficking and smuggling.
- Have a modern slavery and human trafficking page on our intranet, which provides:
 - Links to Home Office guidance.
 - A staff briefing.
 - A Modern Slavery Toolkit.
 - Bitesize learning which can be delivered in services.
- Have mandatory Safeguarding e-learning for all staff as well as Modern Slavery e-learning which is available and encouraged that staff complete this. Support services to work with colleagues in local organised crime units, sharing learning and improving joint working.
- Support our DSLs to:
 - Ensure safeguarding is embedded in all staff and volunteer recruitment processes by fully briefing local recruiting managers.
 - Provide advice and support around safeguarding children and adults at risk.
 - Ensure all staff in their area receive any updated information regarding safeguarding.
 - Make, or support staff to make safeguarding referrals for both adults and children affected by Modern Slavery/trafficking/smuggling.

In the financial year 2023/24, 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 is detailed below:

- *Establish a Modern Slavery Panel, which meets at least twice a year to discuss actions relevant to:*
 - *Raising awareness across the organisation.*
 - *Identifying areas for improvement.*
 - *Identifying best working practices.*
 - *Producing materials to be shared within the organisation, including new modern slavery guidance for our staff and volunteers that aligns with the Home Office Guidance. This guidance will help to raise awareness around modern slavery and support staff to respond if they have concerns about modern slavery in our service operations.*

The composition of the group has been formally established, and a commitment to participate actively within the group has been solicited. Although the group has not convened yet, this action is scheduled for implementation in the 2024/25 period. We recognise that the success of the objectives outlined for the year is fundamentally tied to the effective functioning of this group. This commitment will be taken forward into 2024/25.

- Increase knowledge and skills relating to the identification, management, and prevention of modern slavery. We aim to do this, in part, by:
 - Ensuring that every DSL has completed the Modern Slavery e-learning by April 2024.
 - Providing a Continuing Professional Development (CPD) course on modern slavery at regional meetings for DSLs.

Following a change programme in the assurance directorate, we now have Safeguarding Business Partners who have specific lead roles. One of these is Modern Slavery, they each work with specialist national networks to keep up to date with trends and feeding learning back into our organisation. The intention for 2024/2025 is to deliver an up-to-date comprehensive CPD session for DSLs in the third quarter. This commitment will be taken forward for 2024/25.

- Review and update the following key documents to ensure they include relevant information regarding modern slavery:
 - Code of Conduct.

- Whistleblowing.
- Complaints.

The policies and procedures remain under review with an aim of the above to include/consider the impact of Modern Slavery within the 2024/25 statement period.

6. Commitments for 2024/25

We are dedicated to continually improving our practices, to ensure the people we support, our staff and our communities are safe. Our dedication drives us to respond to and disrupt modern slavery, human trafficking and smuggling.

- Over the next 12 months we will bring together the Modern Slavery 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 relationships 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.
- Support our DSLs and the wider workforce to increase their knowledge and understanding around modern slavery, human trafficking and smuggling.
- 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.
- 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.
- 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.
 - Complaints.
 - Procurement Policy.
 - Bribery and Corruption Policy.
- 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.
 - Evidence social value delivered by procurement activity.

7. Information about this document

Who has written this statement: Sarah Valums

Date of next review: September 2025

8. Document history

Version	Version date	Name of reviewer	Amendment details
1.0	September 2024	Sarah Valums	First version.
