



**ANTI-SLAVERY AND HUMAN TRAFFICKING  
STATEMENT FOR FINANCIAL YEAR  
31 March 2019 to 1 April 2020**

**WHAT IS MODERN SLAVERY?**

Someone is generally considered to be in slavery if they are threatened to undertake work, are being held and made to work against their will, undertake work they are not free to choose to do, or otherwise have no control over, and cannot end their employment without risking harm to themselves or their family.

Thera has a responsibility to be alert to the risk of modern slavery both in our own activities and those of our suppliers and to act upon any concerns we may have.

Of particular concern to Thera is the potential risk of modern slavery and its impact on people with a learning disability whose vulnerability puts them at higher risk of being subject to such control.

**OUR ORGANISATION STRUCTURE**

Thera Group is a large and complex charitable group of companies . The Group consists of 30 companies, led by parent charity, Thera Trust, providing a range of care, support and services to adults with a learning disability to live the life that they choose.

Thera employs more than 3,000 staff across the UK and has a turnover of approaching £70m.

Our activities include the provision of direct care and support, along with specialist services including financial advocacy, specialist housing, quality assurance, employment and training and social enterprises.

**OUR SUPPLY CHAINS**

Our supply chains relate to the provision of social care and include the sourcing and purchase of products such as capital equipment, hotel accommodation, travel, goods and services, including the very occasional provision of agency staff.

## **OUR POLICY AND APPROACH**

Thera is committed to working ethically and with integrity, and we seek to work only with those organisations who also want to do so and can demonstrate that they work in that way, and who share our Vision and values.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our own work.

In particular, we are committed to ensuring, through our delivery of care, support and services, that vulnerable people with a learning disability are not being exploited or controlled or are unable to speak out.

Our staff work under Thera's Code of Conduct as well as alongside Skills for Care's Code of Conduct for adult social care workers and healthcare support workers.

Thera has a range of policies which reflect our commitment to act against modern slavery and human trafficking, including, but not limited to, areas such as bullying and harassment, equality and diversity, recruitment and selection and safe-guarding and whistleblowing.

We operate safe recruitment practices to ensure not only that our staff are competent and capable, but are also eligible to undertake work freely on our behalf.

The occasional procurement and use of agency staff is overseen at board level, managed effectively and risks are mitigated by specific due diligence and contract management processes. Thera uses only specified, reputable employment agencies and verifies the practices of any new agency before accepting workers from them.

In the purchase of other equipment, accommodation, travel, goods and services, we expect our companies to manage their activities efficiently and effectively. We always seek to source goods and services from reputable and recognised organisations.

We undertake due diligence in respect of all of our purchasing activities across the Group, seeking reassurance in respect of how suppliers comply with the legislation, including their approach in vetting their own suppliers to ensure the overall supply chain and purchasing process is ethical.

We are committed to ensuring that our suppliers adhere to the highest standards of ethics and suppliers are required to demonstrate that they provide safe working conditions where necessary and treat workers with dignity and respect and act ethically and lawfully in their use of labour.

As far as possible, we utilise suppliers that we are satisfied meet ethical purchasing requirements, for example using Fair Trade items.

We ensure our HR and payroll systems are effective in identifying and reporting on any actual or potential breach of the legislation.

## **TRAINING**

We will ensure that managers, and those who procure goods and services for the organisation, have undertaken an e-learning module to ensure that they are aware of legislation, risks and our responsibilities in this area and that they are able to act and report accordingly.

## **REPORTING**

Anyone across the Group who has any concerns about modern slavery and human trafficking can report those concerns either to their immediate line manager or can utilise our Whistleblowing Policy to report them.

Thera's Whistleblowing Policy encourages people to report any concerns related either to Thera's own activities or within our supply chains. The policy and procedure is designed to ensure that it makes it easy for people to raise concerns without fear of victimisation.

Where concerns are raised about suppliers or contractors, we will consider whether it is appropriate to terminate the relationship or contract where we believe that our concerns have not been adequately explained or addressed.

This statement has been approved by the Thera Trust board in pursuant to the Modern Slavery Act 2015 s54(1) and constitutes our group statement for the current financial year 2019-2020.

**ISSUED PURSUANT TO SECTION E**

**MODERN SLAVERY ACT 2015**

Signature:

Name: Simon Conway

Date: 31/03/2019