

the calico group

Modern Slavery and Human Trafficking Statement 2023-24

Introduction

The Modern Slavery Act 2015 ('The Act') seeks to prevent the exploitation of workers and stop human trafficking.

The Calico Group takes a zero-tolerance approach to modern slavery and human trafficking. This statement reflects our commitment to acting fairly, ethically and with integrity and to implementing effective systems and controls to ensure modern slavery and human trafficking does not take place within our direct business operations or wider supply chain.

Organisational Structure

The Calico Group is a group of companies dedicated to making a positive difference to people's lives through the provision of housing, care, support, training and life skills. The Group comprises the following companies:



This statement is made on behalf of the Group as a whole.

Responsibilities

This statement is approved by the Calico Group Board of Directors.

The Group Board is responsible for ensuring compliance with the Act and has delegated authority to the Executive Team to implement the necessary internal controls, policies, training and reporting to ensure risks are minimised.

The Group Head of Governance and Regulation has responsibility for monitoring the implementation of this statement.

Individual managers are responsible for the day to day implementation of the Calico Group's policies and procedures and ensuring their teams understand and comply with this statement and are given adequate training on the issues of modern slavery and human trafficking.

The prevention, detection and reporting of any instances or concerns of modern slavery and human trafficking is the responsibility of all colleagues, with the requirement that those concerns are raised at the earliest possible opportunity.

Procurement and Supply Chains

As a provider of a diverse range of services, the Calico Group has a multi-disciplined supply chain including construction and maintenance, materials, medical supplies and consultancy.

We are committed to ensuring that our supply chain adhere to the highest standards of ethics and ensure that our contracts make it clear that serious violations of our policies will result in termination of the business relationship. Our suppliers and contractors are required to comply with the Act, to follow our policies and where applicable, to understand the needs of the vulnerable people we work with.

The majority of our suppliers are based within the UK, but we are aware that some of our suppliers outsource or manufacture overseas. We are aware that the risk is higher with these suppliers and endeavour to work with reputable businesses that have systems in place to ensure their supply chains comply with our values. We are committed to undertaking appropriate due diligence when procuring goods and services to mitigate the risk of modern slavery and human trafficking within our supply chain.

The Calico Group is committed to continuously improving our procurement practices in relation to tenders and contracts to ensure they reflect best practice and legislative requirements, and that modern slavery and human trafficking remain a key consideration in all procurement activities.

Assessing and Managing Risk

The Group actively manages risk in accordance with its Risk Management Framework, working closely with our independent, internal auditors to devise a risk based internal audit plan which provides the necessary assurance that controls put in place to mitigate risks are designed and are operating effectively.

Whilst the Calico Group has not identified a specific modern slavery risk, risks in relation to compliance with regulation and legislation are captured and monitored with potential risks mitigated by our policies and procedures, business operation controls and the knowledge, skills and behaviours of colleagues.

Due Diligence

In understanding the implications of the Act, the Group has identified the following areas within our business and supply chain which represent the greatest modern slavery risks:

Modern slavery can occur in a supply chain through inadequate or inappropriate procurement and contract management practices. Our supply chain consists mainly of services rather than goods, with the highest risk areas being associated with our temporary low-skilled labour resource, building and maintenance activity.

Supporting vulnerable customers – we may also come across slavery and/or human trafficking in connection with the vulnerable people we support, in particular those from minority or socially excluded groups who may be subject to forced labour and/or domestic servitude, and potentially in connection with our workforce.

We have identified the main risks in respect of these key areas and put measures in place to mitigate them. These include:

- Building long-standing relationships with local suppliers and making clear our commitment to supporting the eradication of modern slavery and human trafficking
- Appointing a Head of Procurement to oversee the effective implementation of the Procurement Strategy.
- All suppliers being asked to confirm they are compliant with the principles of the Act.

- New contract tender requirements including an obligation for suppliers to comply with the Act.
- Connecting all staff within the business to our values.
- Increasing leadership focus on our equality, diversity and inclusion (EDI) objectives in order to role model the eradication of modern slavery and human trafficking.
- The Group's recruitment process being open and transparent and including direct communication with candidates to discuss the role and terms and conditions.
- Regularly auditing and reviewing our practices for checking that all employees are paid at least the minimum wage.
- As part of the recruitment onboarding process, identities are checked, 'right to work' established and checks, where appropriate, undertaken with the Disclosure and Barring Service for the protection of vulnerable customers and clients.
- Undertaking checks when making property lettings to ensure rights of residency and conducting periodic visits to engage with residents.
- Encouraging all colleagues entering properties to be aware of potential vulnerability and safeguarding issues and empowering them to raise concerns.
- Carrying out cyclical audits of high risk areas e.g. procurement and safeguarding.
- Secured DAHA accreditation and established a network of Domestic Abuse Champions.

Relevant Policies

The Calico Group has a framework of strategies, policies, procedures and contractual requirements in place which reflect our commitment to acting ethically and with integrity and which seek to ensure the risk of modern slavery or human trafficking taking place within our organisation and supply chains is minimised. Such documents include:

- Anti Fraud Policy
- Anti Money Laundering Policy
- Code of Conduct
- EDI Strategy
- Contract Management Policy
- Dignity at Work Procedure
- Financial Regulations
- Grievance Procedure
- Procurement Policy
- Recruitment and Selection Policy
- Risk Management Strategy and Policy
- Safeguarding Policy
- Whistleblowing Procedure

Our policies and procedures are kept under review to ensure they reflect the aims of the Group and the needs of the people and communities it serves.

Training and Support

All new Group employees and volunteers are required to complete mandatory Safeguarding Adults and Children e-learning within two weeks of appointment. The training aims to educate and empower colleagues to identify potential risk factors and at-risk groups, including signs of exploitation and how to respond to them. Colleagues are required to refresh their safeguarding training every three years. Mandatory training completion is routinely monitored.

The Group's Safeguarding Policy underlines the Group's commitment to support vulnerable or exploited individuals.

The Group also has also identified a Safeguarding Lead to act as the first point of contact for safeguarding issues and to provide specialist support and advice.

Reporting Concerns

The Calico Group requires all colleagues and contractors acting on our behalf to raise any concerns or suspicions of modern slavery or human trafficking. In line with our Safeguarding Policy, colleagues are able to register any concerns with management for further review.

During 2023-24 we have not been made aware of any human trafficking/modern slavery activities within our supply chain.

Monitoring Effectiveness

Whilst a wider range of performance indicators will be considered in the future, the main method of monitoring effectiveness within the supply chain is via the qualification criteria for suppliers, which includes a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain. Whether or not an organisation publishes its modern slavery statement is a standard question asked in our onboarding process as part of due diligence before any supplier is set up.

Ongoing frequent monitoring of employee relations cases ensure concerns regarding potentially vulnerable colleagues or circumstances are escalated accordingly. Employee relations cases are monitored.

Completion of mandatory training is monitored and processes are in place to identify and address instances in which staff members have failed to complete.

Ongoing Commitment - Actions 2024-25

In recognition of its commitment to create a fairer society for all, the Calico Group are eager to take our commitment still further to identify and mitigate modern slavery and human trafficking related risks, and in 2024-25 the Group will:

- Continue to raise awareness of modern slavery and human trafficking across all business areas and supply chains.
- Deliver training to Boards members and members of the Executive Team regarding changes to the procurement regime brought about by the new Procurement Act 2023.
- Consider further measures to assess the effectiveness of steps being taken.
- Review policies coming up for renewal to ensure they reflect our commitment to the Act.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2024.

Signed:



Anthony Duerden
Group Chief Executive
Date: 20 September 2024

Phil Watson
Group Board Chair