

## **Sir Josiah Mason Trust (SJMT) Modern Slavery statement 2019 - 2020**

In accordance with the Modern Slavery Act 2015, Sir Josiah Mason Trust (SJMT) makes the following statement related to financial year 2019-20.

SJMT is committed to ensuring that a culture is maintained which is intolerant to modern slavery, corruption or bribery or fraud. SJMT will continue to ensure that labour conditions for employees within the business or workers within our supply chain are considered at all levels and to a high standard.

### **About SJMT**

SJMT is a Housing, Social Care and Education services charity. SJMT delivers Alms housing, residential care, domiciliary care, property services and landlord related works as well as providing grants and services to young people and those leaving care or in educational need. We currently house 200+ people across 5 different site locations across the West Midlands and employ directly approximately 75 staff.

SJMT is governed by a Board of 10 members, made up of Council nominees, senior management and independent members who volunteer as trustees.

SJMT Head Office is based in Solihull, West Midlands.

### **Policies**

SJMT maintains adherence to the following policies, associated with slavery and human trafficking:

- ☐ Safeguarding Policy (adults and children)
- ☐ Anti-Fraud Policy
- ☐ Guidance for Preventing Bribery (within the SJMT SOFR)

### **Safeguarding**

SJMT embraces its responsibility to safeguard and promote the welfare of children and vulnerable adults when carrying out our work. SJMT has a comprehensive Safeguarding Policy which all staff are expected to read and work within. SJMT actively participates in multi-agency partnership arrangements to protect and safeguard people.

### **Anti-bribery and preventing fraud**

SJMT is committed to the highest standards of ethical conduct and integrity in its business activities and is committed to the prevention, detection and deterrence of bribery and fraud. SJMT will not accept any fraud or corruption. This applies to all employees, volunteers and trustees of SJMT and to temporary workers, consultants, contractors and agency staff acting for, or on behalf of, SJMT.

### **Recruitment**

SJMT's recruitment processes include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications, and are paid directly into an appropriate personal bank account. To comply with the Asylum,

Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and followed up.

### **Whistleblowing**

SJMT encourages all its employees, customers and other partners to report any concerns related to the direct activities or the supply chains to SJMT. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. SJMT's whistleblowing policy is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise these via either their manager, a senior manager or via anonymous concerns and complaints forms available across all sites and services.

### **Code of Conduct**

The SJMT code of conduct makes it clear to employees the actions and behaviour expected of them when representing the SJMT. SJMT strives to maintain the highest standards of conduct and ethical behaviour in all its operations and when managing our supply chains. Any breaches are investigated by the Leadership team.

All policies are updated in accordance with changes to legislation or procedure. Due

### **Diligence**

SJMT currently works with around 40 contractors and suppliers, delivering works and services under the following four categories: - Asset Management - Facilities Management - Corporate and Customer Services - Housing Management

SJMT requires its staff to consider all aspects of relevant law when spending money with third parties, including compliance with the Modern Slavery Act.

All major procurement processes are subject to a selection process, which involves the evaluation of each organisation's approach to the Modern Slavery Act, allowing SJMT to use modern slavery as a contributory factor in the shortlisting of suppliers. Prospective contractors will be given a view of the policies and requirements before the tender stage. New contractors will be asked to sign up to SJMT's own policies at the contract award stage. All existing contractors will be requested to confirm their commitment to addressing modern slavery in this way.

Any concerns regarding modern slavery or human trafficking will be investigated and will be raised with the relevant Senior Manager in the first instance.

### **Risk Management**

Around 76% of SJMT's contracts are works or services contracts with a higher risk of slavery and human trafficking taking place due to the lower cost of labour within the maintenance and care sectors.

All areas will be assessed for this risk and SJMT maintain a risk register detailing any mitigating actions. All risks will be reviewed in accordance with SJMT's annual review guidance. Where there is a potential risk for modern slavery or human trafficking to exist this will be highlighted as part of the assessment.

## **Measuring effectiveness**

SJMT is considering the following indicators in order to effectively ensure modern slavery and human trafficking is not taking place within its business:

- Extend contracts with suppliers who demonstrate a commitment to the appropriate labour standards, subject to other areas of satisfactory performance
- Make each supplier's approach to modern slavery and human trafficking a significant part of selection and shortlisting

## **Training**

SJMT is committed to Modern Slavery training for its staff. This mandatory training will be delivered to ensure continuity of our messages on Slavery.

SJMT will identify and prioritise its training and development needs in relation to modern slavery based on:

- The degree and nature of contact practitioners / professionals have with members of the public including children, young people, families and vulnerable adults; and
- The knowledge and understanding of modern slavery that they need to fulfil the requirements of their role.

SJMT supports a tiered level of training that groups staff into high, mid and low priority:

### High Priority:

These staff will have roles which fit into one or more of the following descriptions: they work predominantly with the public including children, young people, families and vulnerable adults; they have specialist safeguarding responsibilities; they are operational managers for frontline staff; they have senior management responsibility for services to the public.

Staff in this category will receive training that provides them with a good understanding of modern slavery including recognition of vulnerabilities and knowledge of how / where to refer.

### Mid Priority:

These staff may have roles which bring them into contact with members of the public. They are not providing direct support to them, but they may be providing other services such as maintenance works.

Staff in this category will be given training that provides a good understanding of modern slavery including recognition of vulnerabilities and knowledge of how / where to refer.

### Low Priority:

These staff will have no contact with members of the public. Following training, staff will have a basic awareness of modern slavery to include recognition of vulnerabilities and knowledge of how / where to refer.

Initial training will be delivered to all existing employees with annual refresher training and an adhoc approach to training for new employees.