



Modern Slavery Policy Statement

Version Number	4.0	Developed by	SLT
Approval Date	July 2025	In Consultation With	
Classification Type - (Confidential, Restricted, Internal use only, None)			None



Modern Slavery Policy Statement

1. Commitment

- 1.1. Framework takes a 'zero tolerance' approach to Modern Slavery and Human Trafficking. This Statement sets out its commitment to preventing both – including child trafficking, in all its business activities and in its supply chains.
- 1.2. The Statement outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2015 (MSA), and to minimise the risks of any association with practices that undermine the safety and dignity for those who use our services and work for us - particularly those from vulnerable groups. It formalises both our commitment, and our approach to ensuring good practice in this area.
- 1.3. Framework will not knowingly support or contract with any business involved in slavery or human trafficking.

2. Organisational Structure and Supply Chains

- 2.1. Framework is a charity registered in England and Wales and a Registered Provider of Social Housing; owning, leasing and managing over 1,400 units of supported accommodation. It has an annual turnover of approximately £60 million per year and its activities are undertaken solely in the United Kingdom.
- 2.2. Framework is a specialist provider of accommodation and housing-related support, care, health, employment and community-based support contracts across the East Midlands, with over 30 years' experience. In 2023/'24, Framework housed 2,296 people and supported over 17,256 separate individuals with a diverse range of needs.
- 2.3. Responsibility for compliance with the MSA rests at the highest level with Framework's Board of Trustees, Senior Leadership Team, Corporate Leadership Team and Organisational Leadership Group. Responsibility for the oversight of this compliance is assigned to the Chief Executive.
- 2.4. Framework's supply chains are drawn mainly from the construction, property maintenance, professional services, cleaning and adult social care markets.

3. Relevant policies, procedures and good practice guidance

- 3.1. Framework adheres to the following policies, procedures and guidance that outline its approach to identifying and responding to modern slavery and human trafficking across its geography and operations:

Whistleblowing Policy:

Framework encourages all staff, service users, volunteers and stakeholders to report any concerns related to the direct activities and/ or supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. Framework's whistleblowing procedure is designed to ensure that there are no barriers to disclosures by workers, enabling them to raise concerns without fear of retaliation.



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Recruitment Policy:

Framework operates a comprehensive and transparent recruitment policy, which is subject to the oversight of its Senior Leadership Team and periodic internal audit. It includes a requirement for robust pre-employment checks including of the 'right to work' in the United Kingdom.

Employee Code of Conduct:

Framework's Code outlines the expectations the organisation has of the actions and behaviours of all its employees in the course of their work, and when representing the organisation. Framework strives to maintain the highest standards of employee conduct and ethical behaviour.

Procurement:

Framework procures goods and services from a large range of suppliers and is committed to ensuring that they adhere to the highest ethical standards. The organisation has a statement on 'Procurement and Modern Slavery and Trafficking', owned by the Corporate Services Director and covering those activities that have been identified as 'Medium Risk'. It recognises modern slavery as a complex supply chain issue, and outlines the activity undertaken to provide assurance in the following areas:

- Construction
- Repair and Maintenance Services
- Professional Services
- Cleaning
- Supplies.

Serious violations of Framework's approach to procurement will lead to the termination of the business relationship with the contractor.

Recruitment/Agency Workers:

Framework uses reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers from it.

Safeguarding Policies:

Framework's Child and Adult Safeguarding Policies identify Modern Slavery as a form of abuse. They detail clear procedures for staff to follow if and where such abuse is suspected. The policies cover Child Trafficking and other Human Trafficking; in addition, clear Indicators are provided on what should alert staff to Modern Slavery, and how they should respond.

Equity, Diversity and Inclusion (EDI) Policy:

Framework's Policy declares Framework's commitment to making equity, diversity and inclusion an intrinsic part of its business as usual. This includes using our influence and purchasing power to deliver equity more widely, and eliminating discrimination both in direct service delivery and when employing others to deliver on our behalf.

Policies, procedures and good practice guidance are disseminated through Framework's intranet, mandatory training requirements and line management structures.



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4. Assessing and Managing the risks of Modern Slavery and Human Trafficking

4.1. Framework has assessed the risks of modern slavery and human trafficking as follows:

- High risk activities: Framework does not believe there to be any high-risk operations within the work of the company, or in its supply chain, with regard to modern slavery and human trafficking.
- Medium risk activities: Supply chains linked to property development and maintenance – both are areas of high organisational reliance on the external contractors needed to carry out most of our building, repairs and cleaning work.
- Low risk activities: Supply chains in the use of temporary staff provided by specialist agencies, predominantly in the provision of adult social care.

4.2. Framework recognises that at times it may encounter Modern Slavery and/ or Human Trafficking in connection with the vulnerable and excluded people who use our services, and we are vigilant to instances of this.

4.3. Responsibility for Framework's compliance with anti-slavery activities is as follows:

Policies:

All policies are reviewed and signed off either by the Board, a Committee or (where appropriate) by the Corporate Leadership Team under delegated authority from the Board. Each is reviewed once every three years, or more frequently if there is a material change of legislation, regulation, good practice, partner or service user feedback that necessitates it.

Risk Assessments:

High level risk assessment and risk management is overseen by Framework's Audit and Risk Management (ARM) Committee in the context of the Risk Appetite Statement that is updated and signed off annually by the Board of Trustees. All members of the Corporate Leadership Team and Organisational Leadership Group have responsibility for assessing and monitoring the risks associated with modern slavery and human trafficking. Framework's Head of Asset and Development, reporting directly to the Corporate Services Director, has specific responsibility for the construction and maintenance-related activity that falls into the medium risk category.

Due Diligence/Investigations:

The Corporate Leadership Team, with support from Framework's Human Resources Team, have responsibility for investigating any suspected instances of modern slavery and human trafficking within or associated with their departments, including child trafficking.

5. Due Diligence

5.1. Framework expects suppliers, partners and other companies it engages with to ensure that their goods, materials, labour and related supply chains fully comply with all relevant legislation including the Modern Slavery Act 2015. Each time a new contractor or supplier with an annual turnover above £36 million is approved to carry out work for Framework, it is required to demonstrate its compliance with the Modern Day Slavery Statement legislation.



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- 5.2. Any suspected incidence of modern slavery or human trafficking would be immediately reported to Framework's Senior Leadership Team in the first instance, and then to the Board. It would then be dealt with appropriately in accordance with the 'Walk Free Modern Slavery Response and Remedy Framework'.¹

6. Training

- 6.1. Led by the Learning and Development Manager, Framework's Training Team source and organise training on modern slavery and human trafficking for staff. They use a range of approaches to this training, including e-learning (mandatory for all employees), classroom courses and specialist external training.

7. Monitoring, accountability and evaluation

- 7.1 Framework is committed to continuous improvement, including in its response to modern slavery. Through regular review of relevant policies, procedures and guidance, its organisational practice aligns with legal and regulatory standards. It engages proactively to maintain and promote awareness of modern slavery and how it evolves.
- 7.2 If there is evidence of modern slavery within our supply chains, the Serious and Untoward Incidents (SUI) Panel will commission an investigation to understand how that happened, with the ensuing report escalated to SLT for approval, action and learning.
- 7.3 The Strategic Safeguarding Group will consider modern slavery annually as part of its workplan - identifying any emerging trends, learning from Safeguarding Adults Reviews and considering any revisions to Framework's training provision that may be required.

This statement has been made in accordance with section 54(1) of the Modern Slavery Act 2015. It will be reviewed annually to ensure continued relevance and effectiveness. This statement was approved by the Board at its meeting on 17th July 2025.

Signed:

Ruth Hawkins
Chair of the Board

¹ [Walk-Free-Response-and-Remedy-Framework-1.pdf](#)

