

Vibrance Modern Slavery Statement

Vibrance Modern Slavery statement is a formal announcement outlining the steps we will take to prevent modern slavery and human trafficking within Vibrance operations.

This statement is in line with Section 54 of the Modern Slavery Act 2015 and therefore outlines Vibrance endeavour to prevent modern slavery and human trafficking in all that we do.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Vibrance has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all organisation dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within Vibrance supply chain.

All Management Tiers including SMT, Middle Management and Scheme/Department Managers full time, part time, relief, agency, contract staff and volunteers, will be trained with the knowledge to protect staff and customers/service users from any form of modern slavery. Our training will also include child labour and any other form of exploitation albeit financial exploitation.

Vibrance understand and recognise the importance of our role to safeguard and support customers/service users we serve and ensure that our operational practice aligns with ethical standards of performance, to uphold human rights at every level.

Equally, the victims of modern slavery will be supported with the legal protection and awareness-raising, with an emphasis on ensuring their safety, recovery and empowerment is defended.

Vibrance operate a number of internal policies which ensure that we are conducting our delivery of service in an ethical and transparent manner. These include:

1. Recruitment

Vibrance operates a robust recruitment policy, including conducting eligibility to work in the United Kingdom checks which includes proof of identity for all directly employed staff. Agencies approved as a sole agent are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will.

2. Equal Opportunities

Vibrance have a range of controls to protect staff from poor treatment and/or exploitation, which complies with all respective laws and regulations. These include

provision of fair pay rates, fair terms and conditions of employment, and fair access to training and development opportunities

3. Awareness Training of Modern Slavery

All employees will be provided with training to recognise signs of modern slavery and are educated on the importance of reporting concerns. Our staff will be encouraged to raise any issues or suspicious in a safe confidential manner.

Modern Slavery will also be discussed at our Corporate Induction training which is mandatory for all our new starters. We are looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our organisation.

4. Safeguarding

We adhere to the principles inherent within both our safeguarding children and adults' policies. These are compliant with CQC regulations and provide clear guidance so that our employees are clear on how to raise safeguarding concerns about how colleagues or customers/service users receiving our services are being treated, or about practices within our organisation or supply chain

5. Whistleblowing

We operate a whistleblowing policy so that everyone in our employment knows that they can raise concerns about how colleagues or customers/service users receive our services are being treated, or about practices within our organisation or supply chain, without fear of reprisals, and the various ways in which they can raise their concerns

6. Standards of organisation conduct in line with Vibrance core values

These standards explain the manner in which we behave as an organisation and how we expect our employees and suppliers to act. These standards of behaviour are captured in our Core Values for our staff and leaders.

7. Procurement

Our approach to procurement and our supply chain will:

- Ensure that our suppliers are carefully selected through our robust supplier selection criteria/processes.
- Require that the main contractor provides details of its sub-contractor(s) to enable Vibrance to check their credentials.

- Randomly request that the main contractor provide details of its supply chain.
- Ensure invitation to tender documents also contains clauses giving Vibrance the right to terminate a contract for failure to comply with employment laws.
- Supplier adherence to Vibrance core values.
- Where it is verified that a subcontractor has breached employment laws or human trafficking. Vibrance will require that the main contractor substitute a new subcontractor.

Vibrance has a zero tolerance to slavery and human trafficking and thereby expect all our direct and indirect suppliers/contractors including our sole agency, to adhere to the content of Vibrance Modern Slavery statement.

8. Monitoring our Performance

We will know the effectiveness of the steps that we are taking to ensure that modern slavery and/or human trafficking is not taking place within our organisation or supply chain, through the creation of our key performance indicators.

Vibrance Board of Trustees will also include modern slavery risks featured within Vibrance Risk Register. Our Risk Register contains a number of mitigations associated with modern slavery; these risks are reviewed every 3 months.