

## Glassmoon group

This statement sets out the steps that Glassmoon group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

### Our Business

Glassmoon group comprises three distinct human-centred businesses: Glassmoon Strategies, Glassmoon Services and Nell Homes.

**Glassmoon Strategies**, provides consultancy and senior level advisory services, and develops innovative digital tools to increase diversity, intersectional inclusion, belonging and wellbeing at work.

**Glassmoon Services**, specialist care provider that supports young adults and adults with learning disabilities & autism to sustainably live their best life in the community.

**Nell Homes**, specialist property provider, that transforms houses into sustainable, community-based, supported living homes.

Through these 3 businesses, we help individuals and organisations to break down barriers to reach their full potential. To make life more people shaped helping organisations be more human by empowering people to shape collective success, and by enabling individuals to find their own path – and to realise their full potential to live what matters.

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

Glassmoon group implements its business strategy in an ethically, socially and environmentally responsible manner. We fully acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights.

The IBHR informs all our policies related to the rights and freedoms of every individual who works for us, either as a direct employee, agency worker or indirectly through our supply chain. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our operations. Respect for the dignity of the individual – and the importance of each individual’s human rights – form the basis of the behaviours we expect in every workplace nationally.

We will not accept any form of discrimination, harassment or bullying and we require all our managers to implement policies designed to increase equality of opportunity and inclusion for all employees including agency workers. We have also developed and implemented policies and processes which are intended to extend these commitments through our supply chain.

### **Policies in Relation to Modern Slavery and Human Trafficking**

We have several internal policies to ensure that we are conducting business ethically and transparently (all policies are kept in QCS). We prioritise guidance on identifying and reporting safeguarding concerns, modern slavery and human trafficking within our colleagues' Safeguarding training, whenever it is deemed relevant. This ensures that our employees receive the necessary knowledge and resources to effectively address and report any potential issues related to safeguarding, modern slavery, or human trafficking. These include:

- **Equality Human Rights Policy and our Conduct Performance and Ethics Policy** where we confirm that we will not tolerate or condone the abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected
- **Whistleblowing Policy**, aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like modern slavery. All reports will be fully investigated, and appropriate remedial actions taken. We will work closely with social care and health providers ensuring that our policies and procedures dovetail with local procedures and best practice
- **A Robust Recruitment Policy**, including conducting eligibility to work in the UK and DBS checks for all employees to safeguard our colleagues and the people we support
- **Employee Code of Conduct**, consistent with any professional codes of conduct

## **Due Diligence Process**

- The Company encourages members of the public or people not employed by us to write, in confidence, to raise any concern, issue or suspicion of modern slavery in any part of our business
- Suppliers
- Across the Glassmoon group the risk is believed to be low, at this point. The diligence process requires suppliers to make Glassmoon group aware of any third-party suppliers who don't conform to our modern slavery policy

We conduct due diligence on all suppliers before allowing them to become a preferred supplier. We include an online search to ensure that these organisations have never been convicted of offences relating to modern slavery and we include our modern slavery policy as part of our contract with all suppliers. We place great importance on modern slavery and, in cases where satisfactory evidence cannot be provided to Glassmoon group, we will diligently assess the situation and consider excluding such suppliers from further participation in any tender processes.

Suppliers are required to confirm that no part of their business operations contradicts this policy. As part of our contract with suppliers, they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their suppliers to account over modern slavery
- For UK based suppliers, they pay their employees at least the national minimum wage/national living wage (as appropriate) and to ensure that within their supply chains, where UK based suppliers have overseas supply chains, that their employees' pay is consistent with their national minimum wage requirements, working conditions are safe and fair, there is no child labour and working hours are not excessive
- We may terminate the contract at any time should any instances of modern slavery come to light

## **Risk Assessments and Management**

- Our supply chains include procurement of staff, procurement of materials, facilities maintenance, utilities, waste management and technology services.
- Glassmoon group will ensure that we support the eradication of modern slavery, that staff understand how to recognise modern slavery and the appropriate

safeguarding reporting processes are followed should there be concerns within our supply chains, with customers or suppliers

- Performance indicators – we conduct an annual review of our modern slavery statement and policy. Any necessary adjustments or additions to the statement are promptly reported to the main board at Glassmoon group
- Our strategic intention is to have no reports received from employees, the public, or law enforcement agencies or local safeguarding teams to indicate that modern slavery practices have been identified. In the event that there are reports, this will be taken seriously, and all efforts will be made to resolve and eradicate

## **Safeguards & Whistleblowing**

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business. Detrimental treatment includes disciplinary action, dismissal, threats or other unfavourable treatment connected with raising a concern.

Glassmoon group will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and makes validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against that individual.

## **Scheduled Activity For 2024, Further Embed the Principles**

- We will adjust our safeguarding focus to further increase awareness amongst all colleagues
- We will implement a revised procurement approach that will ensure clear and transparent contracting with reputable suppliers
- We will distribute a questionnaire to all suppliers requesting confirmation of their compliance with the Modern Slavery Act 2015
- We will conduct additional training sessions with our Senior Management Team to enhance their understanding of our due diligence process whilst adhering to the modern slavery procurement guidance available on [WWW.GOV.UK](http://WWW.GOV.UK)



- Delivering comprehensive awareness training to our colleagues on the Modern Slavery Act 2015, equipping them with the necessary knowledge on how to identify and report suspected cases of slavery or human trafficking
- Incorporating considerations of modern slavery risks and prevention into Glassmoon group's policy review process as both an employer and purchaser of goods and services
- Continuously reviewing and implementing measures to enforce a zero-tolerance policy towards modern slavery

### **Responsibility for this Statement**

The ultimate responsibility for the prevention of modern slavery rests with the Directors and Senior Leadership Team for ensuring that this policy and its implementation complies with our legal and ethical obligations. Managers at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

### **Assessment of Effectiveness in Preventing Modern Slavery**

We understand that modern slavery risk is not static, and we will continue our approach to mitigating this risk. We will assess the risk via our internal governance and external regulatory inspections processes.

This statement is made according to section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement of Glassmoon group for the financial year ending 2023. Carole Edmond of Glassmoon group has approved this statement.

### **Approval of this Statement**

This statement was approved by: Carole Edmond – CEO Glassmoon group

Date: 20/02/2024