



MODERN SLAVERY STATEMENT

INTRODUCTION

Brook is a national charity supporting people with their sexual health and wellbeing. We offer a range of services to support our mission of helping people to live healthier lives.

Our vision is that everyone is supported to live healthy lives, free from inequality and strengthened by fulfilling relationships. In keeping with our vision, we are committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

Though Brook is not legally required to publish a slavery and human trafficking statement, pursuant to section 54(1) of the Modern Slavery Act 2015, we are committed to operating ethically throughout all aspects of our business. We believe it is important to be open and transparent about our recruitment practices, policies and procedures in relation to modern slavery and the steps that we are taking consistent with our sector, size and reach.

STRUCTURE AND GOVERNANCE

Brook Young People (Brook) is a registered charity (703015) and company limited by guarantee (2466940).

The business of the charity is managed by the board of trustees. The board delegates authority to its committees and to the Chief Executive within a written Scheme of Delegation. Brook has three governance committees:

- Risk, Finance and Audit Committee
- Operations and Quality Committee
- Participation Committee.

Trustees sign Brook's Code of Good Governance, committing to working in accordance with the Nolan Principles (the seven principles of public life), the Charity Governance Code, and Brook's values.

POLICIES

Brook's policy on **Modern Slavery and Human Trafficking** (Policy 2.13) outlines the steps that Brook has taken, and is continuing to take, to understand and minimise the potential risk of modern slavery and human trafficking in our business and our supply chains.

Our **Whistleblowing** (Policy 3.12) and **Grievance** (Policy 3.10) policies, procedures and reporting mechanisms provide channels for staff to raise any concerns about modern slavery and human trafficking, ensuring that everyone working for us knows



how, and is unafraid, to come forward if they have concerns, in line with the Public Interest Disclosure Act 1998.

Our **Recruitment and Selection Policy** (Policy 3.2) ensures that thorough right to work checks are undertaken and that transparent contracts and fair wages are offered. Brook is an accredited Real Living Wage employer. We provide ethical working conditions with annual leave, sick pay and maternity/paternity pay beyond statutory provision. We provide multiple mental health and wellbeing initiatives including flexible and hybrid working, as have introduced a four-day working week as a permanent benefit, allowing staff to work 20% fewer hours with no reduction in pay.

In addition, the following policies provide a framework within which the risk of modern slavery is minimised:

- Policy 1.1 – Safeguarding
- Policy 2.4 – Anti-corruption, fraud and bribery
- Policy 2.9 – Procurement
- Policy 2.11 – Corporate Governance
- Policy 2.12 – Conflict of Interest
- Policy 3.1 – Equality, Diversity and inclusion
- Policy 3.3 – Pay and Benefits
- Policy 3.9 – Wellbeing
- Policy 3.13 - Volunteering
- Policy 4.4 - Partnerships

DUE DILIGENCE

Brook operates rigorous supplier due diligence procedures. Our standard sub-contractor/ supplier contracts mandate ethical procurement and employment practices throughout local and global supply chains, including zero tolerance of modern slavery and child labour, compliance with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes, and compatibility with the rights contained in the European Convention on Human Rights.

Further, the contracts mandate payment of the Real Living Wage to employees and regular third party contracted staff, the provision of a whistleblowing policy that makes it easy for workers to make disclosures without fear of retaliation, and compliance with the Equal Opportunities Commission's Codes of Practice for employment and equal pay.

We check expertise/ credentials including their CQC (where relevant) and regulatory compliance, contract performance history, and financial capacity to assure the quality, safety and sustainability of our service.

RISK ASSESSMENT AND MONITORING

Brook considers our supply chain to have a low risk of modern slavery. Our standard contracts require sub-contractors/ suppliers to provide evidence of compliance with ethical practice clauses and to notify Brook of any matter arising. The greatest



identified risk is the procurement of pharmaceuticals and clinical consumables within our suppliers' manufacturing/ outsourced supply chains. We monitor our supply chain to identify any concerns about unethical practice.

Brook does not knowingly enter business with any organisation, which knowingly supports or is found to be involved in slavery, servitude and forced/ compulsory labour. We are not aware of any such concerns within our supply chain and will fully investigate any such issues if they arise. We have previously investigated a concern regarding a supplier's parent company, raising our concerns with the supplier, reviewing independent investigation reports, and monitoring the completion of actions. Brook will only continue to work with a supplier for whom concerns have been identified if evidence is supplied that modern slavery is not occurring, or that any identified issues have been fully addressed.

TRAINING

Brook staff have access to **training on modern slavery** via our e-learning portal and recruiting managers are trained in safer recruitment practices.

All staff working with service users are trained in identifying risk of harm and receiving disclosures of abuse. Our comprehensive safeguarding training, information and resources includes guidance for staff on possible indicators of modern slavery and trafficking, national referral mechanisms as well as sources of further guidance.

Signed:

A handwritten signature in blue ink that reads 'S. Hutchings'.

Sally Hutchings
Director of Corporate Services
11 April 2025