

Modern Slavery Statement

Written and published in accordance
with the Modern Slavery Act 2015

Financial year ending 31 March 2026

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INTRODUCTION

Milestones Trust is a registered charity that supports adults with learning disabilities and adults with mental health needs. The Trust supports people across over 80 services located in Bristol, South Gloucestershire, North Somerset, Bath and North East Somerset, Swindon, and Wiltshire, and employs around 1,200 people.

Our Modern Slavery Statement sets out the action we've taken to understand potential modern slavery risks, and the steps we've put in place aimed at ensuring that there is no slavery or human trafficking in our operations or supply chains. As an organisation that champions the rights of the people we support, we are committed to ensuring that none of the third parties we work with are involved in modern slavery or human trafficking.

Due diligence

We are committed to maintaining rigorous due diligence processes to prevent modern slavery within our operations and supply chains. This includes conducting regular audits of both our suppliers and our internal processes to identify and address potential risks.

Our review of processes and procedures ensures adherence to relevant regulatory frameworks, particularly in critical areas such as recruitment, employment practices, and sourcing.

In addition, we are developing and will shortly have distributed a comprehensive handbook of policies that is easily accessible to all staff and managers, providing clear guidance on ethical standards, reporting mechanisms, and our zero-tolerance stance on slavery and human trafficking.

In our commitment to eradicating modern slavery, we recognise that effective risk assessment and risk management are critical components of our strategy. Our risk management approach includes implementing robust due diligence procedures, setting clear expectations for suppliers, and establishing ongoing monitoring and auditing mechanisms. Through these measures, we strive to mitigate risks and promote transparency. In the event that we identify a modern slavery risk, appropriate and corrective action would be taken.

Our policies

We have a series of enhanced organisational controls and complementary policies that support both our commitment to our values, and our commitment to the eradication of modern slavery. These include:

- Bullying and harassment policy
- Equality, diversity and inclusion policy
- Conflict of interest policy
- Safeguarding adults policy
- Volunteering policy
- Whistleblowing policy
- Control of Contractors policy (in progress)
- Antibribery and anti-fraud and corruption controls, and
- our Employee Handbook

Our supply chains and related networks

- We work to increase awareness of potential risks of modern slavery across our extended organisation from frontline staff, people we support and their families, managers and Trust office staff, to our partners and suppliers.
- We provide training on how to identify, react to and deal with suspected instances of modern slavery where needed.
- We are undertaking a survey of our third party contractors to ensure that we can be confident they have robust processes meeting the requirements of the Modern Slavery Act.

Training and staff education

In order to foster a deep understanding of the risks associated with modern slavery and human trafficking, we offer all staff access to a comprehensive Modern Slavery elearning training course. The training sessions aim to raise awareness, promote ethical behaviour, and equip employees with the knowledge to identify and address potential issues promptly.

In addition, where we identify areas of our organisation in which we believe people might be at increased risk of exploitation, we continue to offer additional in-person 'Exploitation of Adults' training to managers.

We also ensure that our staff teams are regularly exposed to prompts, messages and communications reminding them of the importance of remaining vigilant to the risks of modern slavery and what they should do if they have a concern. These include updates in monthly briefings to colleagues, reminders issued on key dates - such as Anti-Slavery Day, and posts shared to our staff intranet.

Recruiting our people

Our Recruitment and Selection policy and processes are based on merit and we are determined to reduce the potential risk of modern slavery right from the very beginning of the hiring process.

Our pre-hire due diligence process is fully compliant with legal requirements and the latest government guidance on immigration. We have introduced thorough monitoring and reporting procedures, and we continuously educate our operations managers on safe, transparent recruitment practices free from discrimination or bias.

Milestones Trust works with a neutral vendor to supply agency workers. This vendor conducts due diligence checks on agencies prior to engagement and the supply of agency staff to our services. We have signed up to work only with an enhanced panel of agencies whose workers are fully checked via Credentiaally in real-time to ensure our continued compliance. This means we can be confident that our temporary workforce is engaged ethically and in full compliance with current legislation. If an agency performs unsatisfactorily in audits, it will be removed from our panel.

You can find out more about the steps our neutral vendor has taken to ensure their own compliance at www.neuven.co.uk/modern-slavery-compliance-statement

STATEMENT

This statement has been approved by Milestones Trust's Board of Trustees, and will be reviewed and updated every year.



Hilary Crowhurst, Chief Executive



Donald Nordberg, Chair of the Board