

Modern Slavery Statement 2025

This statement is made on behalf of The Disabilities Trust (company number: 02334589), trading as "Brainkind", pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement for the financial year ended 31 May 2025 (2024/25). This is the 5th statement made on behalf of Brainkind and sets out the steps that we continue to take to prevent modern slavery and human trafficking in our business and supply chains.

Our structure

Brainkind is a company limited by guarantee and a national charity, registered in England and Wales (charity number: 800797) and in Scotland (charity number: SC038972).

Brainkind is governed by its Board of Trustees, with day-to-day management delegated to the Executive Leadership Team.

Brainkind has two wholly owned subsidiaries: the Brain Injury Rehabilitation Trust (company number: 02863860) and York House Ventures Limited (company number: 04735561) which is currently dormant.

Our business and supply chains

Brainkind is a provider of complex care, specialist rehabilitation, care and support for adults with acquired brain injuries and other neurological conditions. Placements into our services are funded by local authorities, Integrated Care Boards and other organisations in the health and social sector, as well as directly by the people we support.

Brainkind is regulated by the Care Quality Commission, the Care Inspectorate Wales, the Charity Commission for England and Wales, Estyn (Office of Her Majesty's Inspectorate for Education and Training in Wales), the Financial Conduct Authority, Homes England, Healthcare Inspectorate Wales, Office of the Scottish Charity Regulator, Ofsted, Welsh Government (Social Landlords and Housing Associations), Health Improvement Scotland and Care Inspectorate Scotland.

Brainkind has around 2,000 employees, approximately 28% of whom are part time and up to 350 temporary or agency staff at any one time. We also have up to 65 volunteers at any one time. Our staff (including temp and agency) and volunteers are all based in the UK.

Our supply chains include medical consumables, medical equipment, catering, furniture, stationery, waste services, utilities, fleet, travel, facilities management, IT services, agency. Our supply chain is primarily located in the United Kingdom.

Our approach

Brainkind maintains a zero-tolerance approach to any form of modern slavery and remains committed to acting ethically, and with integrity and transparency in all business dealings. We are aware of our responsibilities towards service users, employees and the local community and expect all suppliers to Brainkind to adhere to the same ethical principles.

The Board of Trustees has overall responsibility for ensuring that Brainkind complies with its legal and ethical obligations.

All of our policies and procedures remain under review and adaptable to any changes in risks faced by Brainkind and the health and social care sector.

Employment practices

We comply with all UK employment legislation as set out in our Recruitment Policy. Right to work documentation is checked and confirmed before any employment offer is made. All terms and conditions are shared prior to employment and policies are made available to all new staff (including temp and agency) on joining and then are available on our intranet. This includes our complaint and grievance mechanisms and whistleblowing policies, which are in our policy manager.

We only use specified, reputable employment agencies to source labour, and we always verify the practices of any new agency we are using (ensuring that they meet our standards) before accepting workers from that agency. We use a neutral vendor to supply the majority of our agency workers. In the past 12 months we have required them to supply us with their own updated Modern Slavery Policy, confirm that the Modern Slavery provisions in our contract have been complied with and share their inputs to embed awareness within the agencies that supply them. Our HR team meet them regularly and will ensure that these meetings include an update on Modern Slavery.

Brainkind has a whistleblowing policy and a dedicated whistleblowing helpline, in case of concerns about how staff (including temp and agency) or people receiving our services are being treated or about practices within our business or supply chain, without fear of reprisal.

Supply chain

Our procurement process includes due diligence on new suppliers' conformance with the Modern Slavery Act. As part of an exercise to seek more value through the supply

chain, we have approached an external procurement consultant to review our supply chain, checking our costs and preparing a Procurement Plan early in 2026. This will enable Brainkind to assess its supply chain in terms of value for money, the quality of our suppliers and the nature of the goods and services we acquire for our organisation. We will ensure that any subsequent activity pays due attention to Modern Slavery, particularly where we or our advisers identify higher levels of risk.

To ensure that our supply chain comply with our values we will continue to require all material suppliers and partners to confirm that they adhere to the Modern Slavery Act 2015 at the outset of our business relationship.

Training, policies and safeguarding

We adhere to the principles inherent within our policies for safeguarding children and adults. These are compliant with Brainkind's multiagency agreements and provide clear guidance so that our employees are aware of how they can raise safeguarding concerns about staff (including temp and agency) or service users or about practices within our business or supply chain.

Safeguarding Adults mandatory training is required to be completed by all staff (including temp and agency) on induction and then every 3 years and is monitored by our Learning & Development team. Upon completion of the course, all staff will have an understanding of how to safeguard adults in-line with national guidance and understand how and when to report suspicions of abuse. Modern slavery and human trafficking is covered within this mandatory training. Service based staff (including temp and agency) are required to complete Safeguarding Children & Young People Mandatory training on induction and then every 3 years and this is monitored by our Learning & Development team.

Further advice for our staff (including temp and agency) can be found in our [safeguarding policies](#) and procedures and from Brainkind's Safeguarding Lead or local safeguarding champions.

Incident reporting is encouraged, and our employees are also supported by an internal Freedom to Speak Up Guardian who provides independent support and advice to staff (including temp and agency) who want to discuss their concerns whilst also respecting their confidentiality.

A number of safeguarding resources are available on Brainkind's intranet pages and also shared via a monthly safeguarding blog with all staff (including temp and agency).

Assessment of risk

Risk registers are managed locally and corporately to manage risks and internal controls effectively and Brainkind's Quality Team monitor compliance via internal audits.

We have assessed the overall risk of modern slavery to be medium. There have been no suspected or actual instances of modern slavery reported in relation to our business or supply chain for the year ended 31 May 2025. In the event of any such reports we would provide all necessary assistance to the relevant authorities.

Nevertheless, we will continue to promote awareness of the signs of modern slavery and improve our framework to mitigate risk against it.

Progress since our last statement

In the 2024/25 financial year we sent a delegate to the Modern Slavery conference hosted by Oxford University. We strengthened our risk management and policy review processes. The year also saw the creation of an Internal Audit function which includes Modern Slavery within its audit universe.

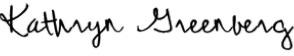
Targets for the year ahead

We will continue to keep our internal processes under review to identify what further steps can be taken to ensure that our obligations under the Act are met and to mitigate against slavery or human trafficking taking place in any part of our business or supply chain.

Some of the specific measures we will be progressing during the financial year ending 31 May 2026 include:

- Ensuring Modern Slavery is an agenda item for management meetings with our main vendor of agency services;
- Considering how to gain greater assurance on the hiring of other agency staff who are not introduced via that vendor;
- Working with any procurement agency we appoint to ensure that they conduct appropriate due diligence on Modern Slavery as part of any exercise to source goods and services and report compliance to us;
- Verifying that the risks around Modern Slavery are low on the goods and services we continue to procure in-house (for example, utilities and fleet); and
- Continuing to monitor (via our Trustees Quality and Governance Committee) good practice and any proposed legislative changes in the area and training appropriate staff members

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Brainkind's slavery and human trafficking statement for the financial year ending 31 May 2025.

Signed by:

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The statement was approved by the Board on 23rd February 2026 and signed on behalf of the Board by Kathryn Greenberg, Chair of the Board of Trustees.