



Modern Slavery and Human Trafficking Statement

Peopleton Brook Care Farm

Reporting period: Financial year ending in 2026 - insert the exact year-end date before approval

Statement owner: Jake Payne, Business Manager

Approval date: 06/08/2026

Effective date: 01/09/2026

Next review: Within six months of the next financial year-end, or sooner after a material change or incident

Approval check: Before publication, the approving body must insert the exact financial year-end, confirm the organisation's legal form and group turnover, complete the annual evidence record, approve the final wording and record the appropriate signatory. These facts must not be guessed.

1. Status and purpose

Peopleton Brook Care Farm (PBCF) is committed to preventing slavery, servitude, forced or compulsory labour, human trafficking and exploitation in its own activities and supply chains. This public statement describes PBCF's proportionate approach for the reporting period and is intended to support transparency, ethical practice and continuous improvement.

Section 54 of the Modern Slavery Act 2015 applies to a body corporate or partnership that carries on a business or part of a business in the UK, supplies goods or services and has total annual turnover of at least £36 million, including relevant subsidiary turnover. PBCF will confirm its status each year. If the threshold is not met, this statement is published voluntarily; if it is met, the statutory approval, signature, publication and timing requirements apply in full.

Transparency, not a guarantee: A modern slavery statement records the steps actually taken during the financial year. It does not guarantee that every tier of a supply chain is free from exploitation. PBCF will be candid about gaps, concerns, outcomes and actions rather than making unsupported assurances.

2. Organisation, people and supply chains

PBCF is an alternative learning and care-farm provider based in Old Sodbury, Bristol. It offers therapeutic, educational and nature-based activities for children and young people, including learners with SEND or mental-health needs, and may support adult participants. Its activities involve employees, volunteers, contractors, visiting professionals, commissioners, families and a range of local and national suppliers.

Principal purchasing and service categories may include:

- agricultural, animal-care, feed, bedding, fencing, tools, machinery and personal protective equipment;
- food, catering, cleaning, laundry, waste, utilities, fuel and facilities or grounds maintenance;
- building, repair, electrical, plumbing, transport and other contracted services;
- educational resources, clothing, textiles, office supplies, information technology and electronic equipment;
- professional, temporary staffing, recruitment, training and consultancy services; and
- commissioned or subcontracted activity, accommodation or venue services where used.

PBCF's direct operations are local, but products and materials may have multi-tier international supply chains that are not visible from the immediate supplier. Due diligence is therefore based on risk and leverage, not only supplier location or size.

3. Governance and related controls

Role	Responsibility
Business Owners / equivalent governing body	Confirm section 54 status; approve the statement; provide oversight and resources; review material risks, incidents and remediation; manage conflicts independently.
Jake Payne - Business Manager	Own the statement and annual evidence record; coordinate risk assessment, due diligence, training, concerns, action tracking and publication; escalate material matters to the owners.
Budget holders and purchasers	Apply proportionate checks before appointment and at review; avoid purchasing practices that create exploitation risk; keep evidence and escalate red flags.
Safeguarding leads	Respond where a child or adult may be a victim; coordinate protection, commissioner and statutory-agency routes; ensure supply-chain action does not compromise a person-centred response.
Managers, staff and volunteers	Remain alert to indicators; follow recruitment, conduct, safeguarding, whistleblowing and reporting arrangements; never investigate or confront a suspected exploiter themselves.
Suppliers and contractors	Comply with law and agreed standards; cooperate with proportionate enquiries; disclose material concerns and corrective action; extend expectations through relevant subcontracting.

This statement operates alongside PBCF's current safeguarding, safer-recruitment, whistleblowing, staff-conduct, complaints, equality, data-protection, health-and-safety and procurement arrangements. Only current, approved documents should be cited publicly; a policy title must not be claimed merely because it appeared in an earlier statement.

4. Risk assessment

PBCF will review modern slavery risk at least annually and when a new supplier, labour provider, material contract, country of origin, allegation or significant change is identified. The assessment considers sector and country risk, labour intensity, use of migrant or temporary labour, subcontracting and recruitment chains, low or implausible pricing, weak visibility, previous concerns, workforce voice and the vulnerability of people affected.

Potentially higher-risk area	Examples of controls or questions
Agriculture, food and animal-related supply	Origin and processing; seasonal or migrant labour; labour providers; unrealistic prices; recognised certification used as evidence, not a substitute for enquiry.
Construction, cleaning and maintenance	Identity of subcontractors; worker status; right-to-work process; supervision; deductions, accommodation or transport arrangements; access to a grievance route.
PPE, textiles, electronics and imported goods	Manufacturing origin; complex tiers; supplier's own statement where applicable; credible risk information; traceability and corrective-action capability.
Recruitment and temporary labour	No worker-paid recruitment fee; transparent terms and deductions; lawful pay and hours; verified agency or labour-provider status; confidential worker contact.
Very low-value or urgent purchasing	Whether price, deadline, late changes or penalties could push risk down the chain; use existing approved suppliers where possible and document exceptions.
Children and vulnerable adults	Signs of criminal, sexual, labour or domestic exploitation; control by another person; unexplained money, travel, injuries, work, accommodation or fear; immediate safeguarding response.

5. Due diligence and responsible purchasing

- screen prospective suppliers proportionately, including identity, ownership, operating location, subcontracting, workforce model and relevant adverse information;
- check whether an in-scope supplier has a current, board-approved and signed modern slavery statement, while assessing the quality and relevance of the steps described rather than relying on the document alone;
- use proportionate contractual expectations covering legal compliance, disclosure, access to information, subcontracting, corrective action and termination or suspension where necessary;
- apply enhanced questions, evidence, meetings, site visits or independent assurance where the risk warrants it;
- consider responsible purchasing practices, including realistic pricing, lead times, specifications and payment, so PBCF does not create pressure that increases exploitation risk;
- record the decision, evidence, residual risk, responsible person, actions and review date in the supplier or contract record; and
- monitor material suppliers and contractors through performance, workforce feedback, incidents, complaints, changes and renewal checks.

The response to a concern will be proportionate and centred on affected people. Immediate termination is not automatic: ending a contract without a safe remediation plan can increase worker vulnerability. PBCF may pause work or purchasing where necessary, seek specialist or authority advice, require corrective action, support remedy, increase monitoring, suspend or terminate the relationship, and report to commissioners or authorities as appropriate.

6. Recruitment, employment and volunteering

- use lawful, fair and transparent recruitment and safer-recruitment checks appropriate to the role;

- provide written terms, clear pay and working arrangements, lawful deductions, access to policies and a safe way to raise concerns;
- not retain passports or identity documents except briefly for a lawful check, and never as a condition of work;
- not charge a worker or volunteer a fee to obtain a role; recruitment is treated as an employer or supplier cost;
- check labour agencies and contractors proportionately and prohibit unauthorised substitution or opaque subcontracting;
- monitor indicators such as control by another person, debt, threats, withheld wages or documents, excessive hours, restricted movement, unsuitable accommodation or fear of authorities; and
- ensure volunteering, placements and learner activities are genuinely educational, therapeutic or voluntary and are not used to displace paid labour or meet commercial production targets.

7. Raising and responding to a concern

Anyone may raise a concern through their manager, Jake Payne, the current designated safeguarding lead, the whistleblowing route, a Business Owner, a commissioning body or an external authority. Reports may relate to PBCF, a supplier, contractor, worker, participant or another person. Good-faith reporters will be protected from retaliation, and anonymous information will be considered on its substance.

Situation	Immediate action
Immediate danger, serious injury or crime in progress	Call 999. Make the person safe if this can be done without increasing risk. Do not confront a suspected exploiter or alert them to a report.
Child may be exploited or trafficked	Follow the Safeguarding and Child Protection Policy immediately; tell the current DSL; contact children's social care or police as required; inform the commissioner unless doing so would increase risk or conflict with statutory advice.
Adult may be exploited	Follow the Adult Safeguarding Policy; consider immediate safety, capacity, consent, coercion and Care Act referral; contact police or local adult social care as appropriate.
Supply-chain allegation	Preserve relevant records; restrict information to those who need it; notify Jake Payne and safeguarding leads where people may be at risk; obtain specialist or authority advice before approaching the supplier.
Advice or non-emergency report	Use police 101, the Modern Slavery and Exploitation Helpline (08000 121 700), or the GOV.UK online reporting route as appropriate.

PBCF is not assumed to be a National Referral Mechanism First Responder or a public authority with a section 52 duty to notify. Where an NRM referral or duty-to-notify report may be required, PBCF will contact an authorised First Responder such as the police or relevant local authority. Adult consent and child-safeguarding requirements will be handled by the authorised body under current statutory guidance.

Protect people and evidence: Record facts, exact words, dates, people, immediate risks and actions. Do not promise secrecy, conduct covert enquiries, search a person's device without authority, interview suspected perpetrators, or share allegations more widely than necessary. Safeguarding, police and specialist advice takes priority over supplier management.

8. Training and awareness

All staff and volunteers will receive proportionate awareness at induction and refreshers linked to their role. This includes forms and indicators of exploitation, child and adult safeguarding, professional curiosity, safe recording, reporting routes and protection from retaliation. Staff who recruit, purchase, manage contracts or assess suppliers require additional training on sector risk, responsible recruitment, due diligence, purchasing practices, response and remediation.

Training completion and learning outcomes will be recorded. A statement must not claim universal or annual training unless the evidence record supports that claim for the reporting period.

9. Monitoring, effectiveness and improvement

PBCF will use a small set of evidenced measures appropriate to its size and risk profile. The annual review will consider not only activity completed but whether controls identified concerns, protected people, improved supplier behaviour and closed actions. Figures must be drawn from controlled records and must not be inferred from an absence of reports.

Measure	Evidence for the reporting period
Section 54 status and exact financial year-end	To be completed and verified before approval.
Staff and volunteers receiving relevant awareness	Insert number, percentage, audience and any learning assessment from training records.
Material suppliers or contractors risk-screened	Insert number or proportion, risk bands and significant gaps from procurement records.
Enhanced due-diligence reviews and actions	Insert number, principal issues, action status and overdue items without identifying victims.
Concerns, safeguarding referrals or allegations	Insert appropriately anonymised totals and outcomes; distinguish 'none reported' from 'none found'.
Remediation or supplier improvement	Summarise completed and ongoing actions, affected-person input and effectiveness where applicable.

Priorities for the next reporting period, subject to approval and resources, are to:

- complete and maintain a risk-ranked supplier and contractor register;
- embed a proportionate modern-slavery check into new-supplier and renewal decisions;
- verify role-based training and maintain evidence of completion and learning;
- review purchasing practices and high-risk categories, including agriculture, labour providers, construction, cleaning, textiles and electronics; and
- test the concern-response route and record lessons, actions and governance review.

10. Approval, publication and review

The appropriate governing body will review the completed evidence record, legal-status assessment and final statement. If PBCF is in scope of section 54, the statement must be approved by the board or

equivalent management body, signed by the legally appropriate director, partner or designated member, published prominently on the UK website and made available within six months of the financial year-end. If PBCF has no website, the statutory written-copy requirement applies. Voluntary publication will follow the same transparency principles where practicable.

Historic statements should remain available so year-on-year progress can be assessed. The statement will be reviewed annually and sooner after a substantiated concern, material supply-chain or organisational change, new legal requirement or significant weakness in the control framework.

Sources and related guidance

Modern Slavery Act 2015, section 54 — UK Parliament.

Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 — UK Parliament.

Transparency in Supply Chains: A Practical Guide - updated 2025 — Home Office.

Publish an Annual Modern Slavery Statement — Home Office.

Modern Slavery: Statutory Guidance for England and Wales - updated 17 July 2026 — Home Office.

Report Modern Slavery and First Responder Toolkit — Home Office.

PPN 009: Tackling Modern Slavery in Government Supply Chains — Cabinet Office.

Working Together to Safeguard Children 2026 — Department for Education.

Approval and signature record

Approved by	Capacity	Approval date	Signature / confirmation
Jake Payne	Business Manager	06/08/2026	Jake Payne