

Caravan and Motorhome Club

Modern Slavery and Human Trafficking Statement under Section 54 of Modern Slavery Act 2015

Modern Slavery and Human Trafficking Policy

The Caravan and Motorhome Club (“the Club”) is the largest private membership organisation in the UK that provides its members with a full range of products and services in connection with touring and actively promotes enjoyment of the great outdoors.

The Club is committed to high ethical standards and has a zero tolerance approach to modern slavery in all its forms and disguises. The Club fully supports the UK Government’s objectives to eradicate modern slavery and human trafficking and our annual statements under s.54 of the Modern Slavery Act 2015 will set out details of the activities we are taking to support the Government’s objective.

The Club’s Executive Committee, through the Director General, sets the tone of our ethical culture and holds management accountable for communicating ethics and compliance expectations, including in relation to modern slavery and human trafficking. The Director General communicates with senior managers the importance of ethics and legal compliance.

Relevant and appropriately targeted training will be made available in relation to modern slavery to create an ethical and legally compliant culture within the business and supply chain.

The Club is committed to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain and will develop appropriate key performance indicators to enable it to evaluate the success of its activities in this regard.

We encourage members, staff, suppliers and other stakeholders to report any concerns they may have in relation to modern slavery and human trafficking and that they think may have affected the Club to the Director General under the Whistleblowing policy.

G C Chamberlain
Chairman

Updated: April 2017

Slavery and Human Trafficking Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and constitutes the Club's slavery and human trafficking statement for the financial year ended 31 December 2016.

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

Modern slavery is the term used to encapsulate both offences under the Modern Slavery Act: slavery, servitude, and forced or compulsory labour; and human trafficking. The Club has adopted the definition of modern slavery as set out in section 1 and 2 of the Act. In short:

Slavery – the status or condition of a person over whom all or any of the sort of powers attaching to the right of ownership are exercised;

Servitude – the obligation to provide services through the use of coercion and the impossibility to change his or her condition;

Forced or compulsory labour – involves coercion, direct threats of violence or more subtle forms of compulsion;

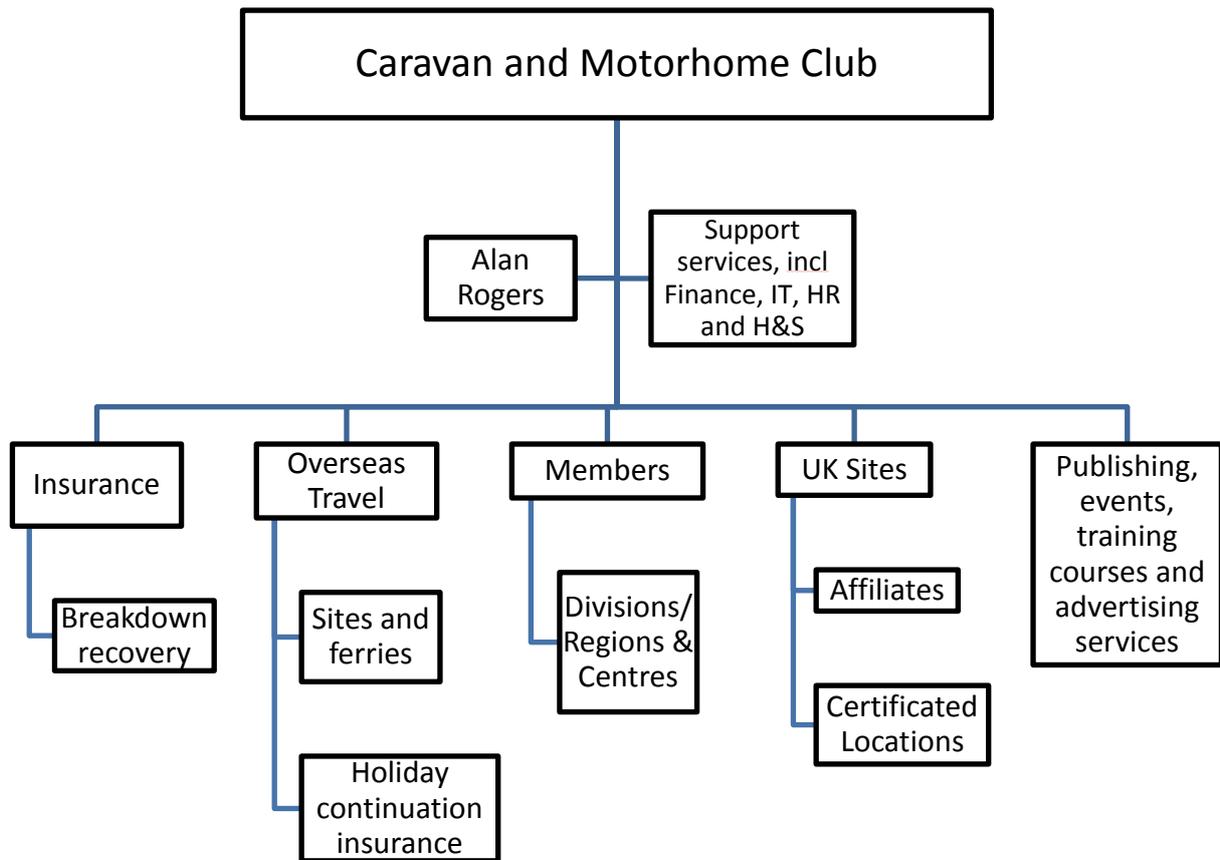
Human trafficking – requires that a person(s) arranges or facilitates the travel of another person with a view to that person being exploited, even if that person consents to the travel.

These definitions provide the Club with indicators to identify potential instances of modern slavery when carrying out its obligations under the Act.

Organisation structure and supply chain

The Club provides a diverse range of services across five main areas – Membership, UK touring Sites, Insurance, Overseas Travel and Marketing Services. The majority of the Club's operations are UK based, whether provided directly by the Club, or through partnership arrangements such as with UK breakdown recovery. Where the Club does operate overseas, its operations are mainly in Europe. A schematic of the Club's organisation structure is given in Table 1 below.

Table 1



The Club's head office staff – around 350, split across 6 main departments – work from a single head office in East Grinstead, West Sussex. The remaining workforce of around 600+ are mainly permanently employed staff, but with a seasonal work pattern, operating the Club's UK touring sites network. The Club can also call on a reserve sites workforce to cover holiday and illness periods for the permanent sites staff. This reserve sites workforce have all previously been permanent sites staff and therefore have the requisite skills to offer cover periods on the same pay levels as the permanent staff. The Club does not recruit its staff from outside the UK population as it is able to meet all its requirements within the UK.

The diversity of services and functions means that the Club has a broad supply chain with approximately actively used 3,000 suppliers. Within this supply chain, there are a few large suppliers and a long "tail" of smaller suppliers. Size in this context refers to the size of the purchases the Club makes – the size of the suppliers may be large or small, depending on the nature of the supply.

Risk Assessment

The Club operates in the leisure and tourism sector in the UK & Europe and considers the risks of slavery and trafficking in its supply chain to be very low. It bases this high level judgement on several factors:

- The high ethical nature of the Club and how this fundamentally influences its approach and attitude to avoid engaging with unethical suppliers irrespective of whether they offer the cheapest cost for the supply;
- The Club's predominantly UK based operations: in terms of the country of origin in the Club's tier 1 supply chain, approximately 85% by number and 95% by value, are based in the UK;
- The Global Slavery Index provides a measure of how much modern slavery is taking place in over 160 countries in the world. The UK measure, at 0.018% of its population, is the equal lowest level recorded in the Index out of the 160 countries, and translates into an estimated 11,700 people in the UK in modern slavery. Our review of the Index measures for the countries in the Club's tier 1 supply chain indicates that they are below 0.21% and therefore in the very low risk category;
- The generally low risk of slavery associated with the industries with which the Club works within its supply chain.

Due to its extensive supply chain and the complex nature of this topic, the Club recognises that it will take some time to fully develop its approach and processes in a proportionate manner relative to the risk and is taking a phased approach based on its assessment of areas of risk. Consequently, the Club is currently only considering its direct tier 1 suppliers as it develops its initial risk assessments and activities.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Modern slavery and human trafficking policy.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking and coercion.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. This policy will be extended to ensure that people outside the Club can raise concerns with the Club in confidence.
4. Equality & Diversity policy. This policy sets out the standards of behaviour and expectations of all employees.

5. Anti-bribery policy. This policy sets out the organisation's zero tolerance stance on bribery and explains how employees should act, identify any instances of this, and where they can go for help.
6. Health and Safety policies. The Club operates a Health and Safety Management System to ensure the health and wellbeing of our members, staff and any third parties visiting or working on our premises. The management system includes a number of policies to guide our staff that are relevant to the H&S risks the Club faces.

These policies set out best business practice and inform our staff, thereby ensuring that modern slavery is not part of the Club's ethical or business practices and will not, under any circumstances, be condoned.

Due diligence activities related to modern slavery

Employee Selection Process

Policies, processes and procedures are in place and have been reviewed to ensure they support the Human Resources activities in order to:

- Mitigate the risk of slavery and human trafficking occurring within the Club by ensuring full compliance with UK Visas and Immigration (UKVI) 'right to work' checks;
- Monitor and address any emerging issues of concern;
- Protect those raising concerns about possible instances of modern slavery and human trafficking.

Supply Chain

The Caravan and Motorhome Club has approx. 3,000 active suppliers that provide a range of products and services across various departments within the business.

The Club operates a purchasing policy in conjunction with an approved supplier list. We conduct appropriate due diligence on suppliers before allowing them to become an approved supplier. Procedures and processes have been updated with the objective that new contracts, tenders and Terms and Conditions have the appropriate statements relating to the Modern Slavery Act 2015 included.

We will be seeking confirmation from them that:

- they have, and are, taking steps to eradicate modern slavery within their business;
- they hold their own suppliers to account over modern slavery;
- for UK based suppliers, that they pay their employees at least the national minimum wage/national living wage (as appropriate);

- for international suppliers, that they pay their employees any prevailing minimum wage applicable within their country of operations.

Depending on the circumstances, the Club is prepared to terminate a contract should any proven instances of modern slavery come to light.

In addition, we are developing an enhanced due diligence process before taking on a supplier that includes an online search that identifies if a supplier has been convicted of offences relating to modern slavery. Additionally, as modern slavery statements become available on supplier websites (where they have a turnover in excess of £36m), our due diligence will include reviewing these statements for compliance.

Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the Club's operations and supply chain, it is developing a training package to be rolled out to specific staff responsible for procurement, supply chain performance, recruitment and management of staff. Training is planned to include:

- Basic principles of the Modern Slavery Act 2015;
- Overview of relevant Club policies, processes and procedures;
- Overview of the Club's procurement and purchasing processes and practices including awareness of the risks that arise if managers put excessive pressure on suppliers prices and associated quality, unrealistic deadlines or acceptance of the use of low-wage labour and poor working conditions;
- Methods and best practices for assessing the risk of slavery and human trafficking across the Club's operations;
- How to identify signs of slavery or human trafficking;
- What action to take when concerns about potential or suspected instances of slavery or human trafficking arise, and to whom within the Club concerns should be escalated;
- Raising awareness and offering guidance around developing and implementing slavery and human trafficking policies with suppliers, contractors and partners;
- Measures that should be taken with suppliers or contractors who do not comply with requirements regarding slavery and human trafficking policies;

More general awareness information and training will be given to all our remaining staff over time through the Club's normal communication channels.

Future Action and key performance indicators

The Club will continue to develop its processes, training and due diligence procedures over time, in a proportionate manner in the light of its evaluation of risk, and so as to ensure it is effective in its actions to prevent modern slavery.

The Club will evaluate what key performance indicators are appropriate to its operations and supply chain but will only report these in future statements when they are considered to be robust and provide a realistic indication of the Club's performance in combatting modern slavery.

This statement was approved by the Executive Committee of the Club and signed on its behalf by:

G C Chamberlain

June 2017