

## 2017-18 Modern Slavery Statement

### Introduction

Robin Hood Energy is the first not-for-profit energy company owned by a local authority. We were set up by Nottingham City Council in 2015, to tackle fuel poverty and give people a cheaper, better alternative to the Big Six. We're proud to be leading the way in trying to reduce fuel poverty for those who need help the most.

This is the first Modern Slavery Statement produced by Robin Hood Energy, and relates to actions and activities undertaken during the financial year 1 April 2017 to 31 March 2018.

As part of the public sector and Nottingham City Council, Robin Hood Energy recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are committed to improving our practices to combat and prevent slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

### Organisational Structure

Robin Hood Energy is a licensed supplier of gas and electricity to over 100,000 domestic and non-domestic premises throughout England, Scotland and Wales. We are wholly owned by Nottingham City Council, a unitary authority providing local government services for over 300,000 citizens. Nottingham City Council and Robin Hood Energy are both located in Nottingham, England.

We employ over 180 staff based in Nottingham, with our annual turnover for the 2017-18 financial year approximately £70m.

Our Board of Directors is comprised of 4 Nottingham City Councilors, 3 Executive Managers (Chief Executive Officer, Finance Director and Operations Director) and 1 Non-Executive Director from Ebico, a white label partner. The Executive Management Team oversee a Senior Management Team, who are responsible for a number of business functions. This includes, but is not limited to, customer service, industry operations, finance, marketing and HR.

### Our Supply Chains

We currently operate throughout England, Scotland and Wales. We have contractual arrangements with a variety of third parties to ensure we can supply energy to our customers. For example, we contract with external payment service providers and meter installers. We also procure certain services from our parent company, such as IT and legal support. The energy which we supply to our customers is purchased directly from the wholesale markets, although we are aiming to establish Power Purchase Agreements with renewable generators in the near future.

As per our parent company, Nottingham City Council, we would expect all suppliers of goods or services to have their own policy relating to working practices or modern slavery, or for evidence to be available to ensure their standards are in accordance with our expectations. We would request that our suppliers ensure the same of their own supply chains.

Further, we would expect that the practices of companies and organisations operating within the EU adhere to Article 4 of the European Convention on Human Rights concerning the prohibition of

slavery and forced labour. Should we look to procure or import products or services from outside the EU, we would undertake further consideration of supply chains in order to take account of potential risks. However, we expect standards to be consistent across all supply chains, regardless of country or origin.

## Our Policies & Procedures

As a wholly owned subsidiary of Nottingham City Council, we have adopted their policies and procedures. Nottingham City Council's Modern Slavery Statements can be located [here](#), which provide further details of their policies and procedures relevant to slavery and human trafficking.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of Robin Hood Energy. In recognition of our differentiated supply chains and separate workforce, we intend to review whether Nottingham City Council's existing policies and procedures remain suitable for use during the next financial year. We will make amendments to these policies and procedures, including the creation of new policies and procedures, where appropriate.

The following are examples of Nottingham City Council policies which we have adopted:

- **Whistleblowing Policy** - This encourages all our employees to report any concerns related to the direct activities or the supply chain of Robin Hood Energy. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for our employees to make disclosures, without fear of retaliation.
- **Equality & Diversity Policy** – This policy eliminates unlawful discrimination, harassment, victimization and other prohibited conduct. It also advances equality of opportunity for both potential and current employees. In order to promote fair pay, we are an accredited living wage employer, with three recognised unions for our employees.
- **Employee Code of Conduct** – This makes clear to our employees the actions and behavior expected of them when representing Robin Hood Energy. We aim to maintain the highest standards of employee conduct and ethical behavior, including when managing our supply chain.

## Due Diligence Processes

In respect of suspected or known incidents of slavery or trafficking we would refer these to the relevant police authority, and where incidents occur in Nottingham, to our Nottingham City Council colleagues, who have a direct link to the local Serious and Organised Crime Board, which has a responsibility for modern slavery.

We note the ethical procurement objectives that Nottingham City Council have developed as part of their Procurement Strategy. We have identified further improvements that could be made to our own procurement activities, in order to fully mitigate against the risk of slavery and human trafficking occurring within our supply chains.

We therefore intend to review all existing and future contractual arrangements in the next financial year to ensure that appropriate mitigation activity has been undertaken. We aim to ensure that we

fully reflect Nottingham City Council's due diligence measures where possible, examples of which can be found via the above link. These measures could include requiring third parties to contractually comply with the requirements of the Modern Slavery Act 2015, incorporating additional requirements into our supplier selection process or implementing sanctions against third parties who fail to address relevant performance issues.

## **Performance Indicators**

We understand that we have a responsibility to continually assess and mitigate against the risk of modern slavery. As Robin Hood Energy, we do not currently measure our effectiveness in ensuring that modern slavery and human trafficking is not occurring in our business or supply chains via key performance indicators.

As part of our training commitments detailed below, we will ensure that all Robin Hood Energy employees will receive the required training by the end of the next financial year. We will consider whether further metrics can be implemented to monitor our awareness-raising campaign.

We will also review the scope of our Risk Management Committee, with a view to incorporating modern slavery and human trafficking risk. As part of our due diligence processes, we will review whether additional oversight of our supply partners is required, for example via additional Service Level Agreements.

## **Training & Awareness**

We recognise that all our employees should be trained on modern slavery in order to raise awareness and increase compliance with the Modern Slavery Act 2015. We continue to use the existing Modern Slavery training designed by Nottingham City Council, for our employees. This e-learning includes how colleagues can identify slavery, how employees can raise concerns about potential slavery and external support available, including details of the National Referral Mechanism (NRM).

We will ensure that all employees receive this training before the end of the next financial year. We will also review whether the current training remains fit for purpose, including whether additional training is required for certain employees. In addition, we will conduct an internal awareness raising campaign to complement the training.

## **Declaration**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Robin Hood Energy's modern slavery and human trafficking statement for the financial year ending 31 March 2018.



**Gail Scholes**  
**Chief Executive Officer**  
**Robin Hood Energy**