



# ***MODERN SLAVERY POLICY***

***August 2024***

***(Review due: August 2026)***



## **Scope**

This policy is intended for all services supporting people in a non-regulated environment.

Examples of a non-regulated environment would include supported living for over 18 years of age who do not require personal care.

Modern slavery and human trafficking are criminal offences under the Modern Slavery Act 2015.

This policy sets out the steps all organisations need to be taken to make sure that modern slavery is not happening or those they work with. This policy applies to all people working for or with the organisation.

The policy has links to any 'Safeguarding Adults Policy' and 'Safeguarding Children in an Adult Setting Policy'. Although modern slavery is generally in relation to staff and safeguarding is generally related to people supported there is the potential for some of the people supported to be involved in modern slavery. Therefore, the inclusion of safeguarding principals must be adhered to.

The organisation is committed to making sure all aspects of the service work to protect all people from modern slavery.

## **Equality Statement**

The charity is committed to equal rights and the promotion of choice, person-centred care and independence.

This policy demonstrates the commitment to creating a positive culture of respect for all individuals. As required by the Equality Act 2010, the charity will work to identify, remove or minimise discriminatory practice in protected characteristics of age, disability, sex, gender reassignment, pregnancy and maternity, race, sexual orientation, religion or belief, and marriage and civil partnership.

We promote positive practice to meet the Human Rights Act and value the diversity of all individuals.

## **Key Points**

- Modern slavery is a crime.
- Human trafficking is the illegal movement of people through force.
- Forced or compulsory labour exacted from a person under threat.
- Staff will be provided with training in modern slavery.

The organisation endeavours to behave with honesty, integrity and act fairly and ethically.

When staff believe there is a possibility of modern slavery, whether within the company or when working with a supplier or contractor they must take action. Please refer to the complaints and whistleblowing sections of this policy.

## **Policy Statement**

Modern slavery is an umbrella term for all forms of slavery, human trafficking and exploitation. It is a crime that affects some of the most vulnerable in society. It is often hidden from view and many victims also do not self-identify, which means that identifying individuals at is challenging. Modern slavery can affect people of all ages, gender and races.

Unfortunately, it is very difficult to assess the number of victims directly, and most of the data sources available can only measure the general level of awareness and response to the problem. Modern slavery in united kingdom is on the rise. The most recent statistics show that 4,138 potential victims of modern slavery were referred to the Home Office from July to September 2023, representing a 4% increase compared to the preceding quarter (3,995) and a 10% decrease from July to September 2022 (4,579).

The organisation has a focus on tackling modern slavery protects vulnerable workers and make sure that recruitment policies and procedures comply with all UK law and regulations.

## **The Policy**

The aim is that all relevant standards, regulations, and legal requirements, and, where possible, are met and potentially exceed. Staff will be provided training in modern slavery within the training schedule.

The organisation will only work with companies that uphold high standards of ethical conduct and fair practices in key areas of regulation and legislation.

The 'Whistleblowing Policy' details the organisations approach to Modern Slavery and reporting of concerns.

## **Definitions**

Modern slavery is the illegal exploitation of people for personal or commercial gain, and covers a wide range of abuse and exploitation including:

- Sexual exploitation
- Domestic servitude
- Forced labour
- Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, benefits fraud
- Forced marriage and illegal adoption
- Criminal exploitation
- Organ harvesting

Victims of modern slavery can be any age, gender, nationality, and ethnicity. They are tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation. They may not recognise themselves as a victim.

Human trafficking is the illegal movement of people through force, fraud or deception with the intention of exploiting them, typically for the purposes of forced labour or sexual

exploitation. Men, women and children are forced into a situation through the use (or threat) of violence, deception or coercion.

Victims can enter the UK legally or on forged documentation or secretly under forced hiding. They may be a UK citizen living in the UK who is then trafficked within the country.

There is no 'typical' victim of human trafficking and modern slavery. Victims can be men, women and children of all ages, ethnicities, nationalities, and backgrounds. It can, however, be more prevalent amongst the most vulnerable members of society, and within minority or socially excluded groups.

Some of the vulnerable groups frequently targeted may include:

- People with low income or with debts
- Women and children
- People with learning disabilities
- People with substance misuse issues
- People with mental health problems
- Ethnic minorities, refugees and illegal immigrants
- Young people running away from home or care

Forced labour is according to the International Labour Service provider (ILO) Forced Labour Convention, 1930 (No. 29), forced or compulsory labour is: 'all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.'

### **Review of the policy**

This policy must be reviewed by a nominated manager, at least annually, or as guidance, regulations, legislation or service provider changes.

All organisations must have robust arrangements to make sure that there is oversight of systems, policies, procedures and practice include checks for modern slavery. These arrangements must make sure that there is effective and rigorous selection and vetting systems in place for all staff, agency workers and volunteers.

To recognise potential concerns and put appropriate actions in place to rectify any concerns. The organisation must make suitable arrangements such for appropriate governance these can include; site visits, audit systems, supervision and Quality Assurance arrangements. The organisation will work with relevant stakeholders to ensure the service delivery is in line with:

- [Modern slavery & recruitment checks](#), CIW guidance
- [Modern Slavery Act 2015](#)
- Other pertinent legislation such as the Human Rights Act 1998
- Complying with policies and procedures
- Failing or unable to meet or address issues raised in inspection reports, and not meeting our statement of purpose.

The organisation is committed to being an ethical employer of staff and compliant with all relevant UK regulations and legislation. The aim is to make sure that staff are treated fairly

and are provided with appropriate terms and conditions which protect them, e.g. Minimum Wage Act 1998.

The organisation will treat all people who come into contact with its services, positively and in line with their human rights.

The organisation requires its staff and managers to:

- Respect people we support and colleagues' individual human rights.
- Not expose anyone to the risk of abuse, improper treatment, and neglect.
- Protect people we support from the risk of harm.

### **Compliance Requirements for Supply Chains**

The following guidance sets out how the organisation will have transparency in its supply chains and service provider.

A Modern Slavery Statement must be produced each financial year, for any business with a turnover of £36 million. This sets out what steps a service provider has taken to ensure modern slavery is not occurring in their supply chains and in their own services.

If the business has taken no steps to ensure slavery and human trafficking is not taking place, they must still publish a statement stating this.

Failure to comply with the production of a Modern Slavery Statement for a particular financial year could mean an injunction through the High Court. Failure to comply with the injunction is a contempt of a court order which is punishable by an unlimited fine.

### **Service Providers Below £36 Million**

Where there is no requirement to produce a statement, although any service provider is encouraged to voluntarily produce a Modern Slavery Statement, especially where they are contracting with service providers above the threshold. Service providers with a turnover of less than £36 million may be asked to provide such a statement to stakeholders about the approach to modern slavery.

The trustee's will review the company's position regarding an annual statement as necessary.

The organisation may use the following to assess the associated risks with the supply chains regarding modern day slavery and take appropriate action with suppliers if concerns are identified:

- Action plans for remedial improvement
- Severance of contracts
- Changes in procurement practice
- Other actions as required by the findings

## **Procurement Process and Ethical Purchasing Practices**

The organisation will work with integrity, ethically and fairly with suppliers and contractors. Actions will make sure that no undue pressure is placed on suppliers to reduce costs or timing to such a point that this forces them to use unethical, unlawful or unfair employment practices.

Procurement practices will be audited on an annual basis and at each point of the procurement process to consider modern day slavery. A report will be prepared for the board by a nominated person in the organisation with an action plan developed as necessary.

All suppliers at each stage of the procurement process will be contractually required to comply with modern slavery policies, procedures and the Modern Slavery Act 2015 as a supplier to the service provider.

## **Mapping Supply Chains**

On an annual basis the designated person for procurement of new contracts and the manager of existing contracts will undertake a mapping exercise of suppliers to identify any high-risk suppliers.

The mapping exercise will be reported to the relevant manager who will agree an action plan to minimise/mitigate risks.

## **High-risk Suppliers**

Any high-risk suppliers identified within mapping supply chains or an audit of procurement will be contacted and due diligence undertaken on their compliance with the Modern Slavery Act, including:

- Policies and procedures
- Annual statements
- Recruitment and employment practices, and
- Actions in place to resolve areas of concern or poor practice.

Where suppliers do not have in place appropriate systems of work, the organisation will contractually require them to adhere to best practice in modern slavery:

- Annual report/audit
- Policies and procedures
- Training on service provider policies, procedures and reporting mechanisms
- Due diligence

Where suppliers do not agree to ensure compliance with the Modern Slavery Act, the organisation will cease trading with the company.

## **Business Planning**

Business plans include a section on modern slavery. This references human trafficking and includes the steps services will take to manage that risk.

## **Employee's code of conduct**

Staff are required to follow the appropriate code of conduct for their profession or role. The organisation aims to maintain the highest standards of employee conduct and ethical behaviour.

## **Recruitment**

All recruitment processes are transparent, audited and reviewed to ensure that they comply with safer recruitment standards and UK law.

This includes robust procedures in place for the vetting of new employees that they confirm their identities, past work history, skills and qualifications.

## **Agency workers**

Where the need arises to source resources from alternative partners, the organisation will verify partners' practices before accepting workers.

## **Pay**

Through human resources policies, the organisation will ensure that all employees are paid fairly and equitably. All payments will be paid directly into the employees' personal bank account to ensure they receive the pay for their work.

## **Safeguarding**

The charity takes its responsibilities to safeguard the welfare of vulnerable adults and children very seriously. The aim is to protect people supported from harm. Safeguarding policies and procedures and those of the relevant local authority are utilised to make sure there is guidance and information to staff and people supported.

## **Training and development**

The organisation has a programme of mandatory induction and training that all staff and managers must complete appropriate to their role.

## **Whistleblowing and raising concerns**

This policy encourages all staff and managers, who have concerns about any aspect of their work to come forward and voice those concerns.

When staff believe there is a possibility of a modern slavery situation, whether within the organisation or when working with a supplier or contractor. They should report it to their manager who will then take it forward by reporting it to any relevant organisations:

- Website: [Unseen - Modern Slavery Helpline](#) or tel: 08000 121700, or
- Call the [Gangmasters and Labour Abuse Authority](#) on 0800 432 0804, or email [intelligence@glaa.gsi.gov.uk](mailto:intelligence@glaa.gsi.gov.uk) with as much information as possible.
- Report an immigration crime to the Home Office by filling in an [online report form](#). Or call the Immigration Enforcement hotline on 0300 123 7000.

The National Crime Agency, Modern Slavery Human Trafficking Unit (MSHTU) plays a key role in the prevention of serious and organised crime including Modern Slavery. [NCA - Modern Slavery Human Trafficking Unit](#)

- Suspicion/concerns can also be reported to the police on 101. In an emergency call the police on 999. If staff have a concern that the organisation has not raised a modern slavery issue appropriately, they must contact the modern slavery helpline, the local authority safeguarding team or the Care Inspectorate Wales.
- Local authority Safeguarding Team if related to a child or a person we support
- The Care Inspectorate Wales.
- Tel: 0300 7900 126.  
[Online contact form.](#)  
Email: [CIW@gov.wales](mailto:CIW@gov.wales).
- The organisation will support any individual in raising concerns and will provide access to external agencies and organisations to make sure they have full access to advice and information.

### **References and Further Reading**

[Modern Slavery Guidance](#)

[Modern Slavery Helpline, Unseen](#)

[Transparency in supply chains – a practical guide, The Home Office](#)

[Frequently Asked Questions - Modern Slavery](#)

[Modern Slavery Act 2015](#)

[What to include in a modern slavery statement](#)

[Modern slavery and human trafficking - National Crime Agency](#)

[The Anti-Slavery Commissioner](#)

[Slavery, Welsh Government](#)

[Modern slavery recruitment checks](#)

[Regulation and Inspection of Social Care \(Wales\) Act 2016 | Law Wales \(gov.wales\)](#)

[The Regulated Services \(Service Providers and Responsible Individuals\) \(Wales\)](#)

[Regulations 2017 \(legislation.gov.uk\)](#)



<p><b>BIRCHWOOD CHARITY</b></p> <p><b>WEST LANCASHIRE CRISIS AND INFORMATION CENTRE</b></p>	<p><b>Located:</b></p> <p>Internal Policy Documents</p>
<p><b>TITLE: COMPLAINTS POLICY</b></p>	<p><b>AUTHORISED BY: CHIEF EXECUTIVE OFFICER</b></p> <p><b>DATE:</b></p>
<p><b>TRAINING</b></p>	<p>All staff will receive relevant training on induction and identified through review and supervision</p>
<p><b>RELATED POLICIES AND PROCEDURES</b></p>	<p>Safeguarding Policy Whistle-blowing Policy Health &amp; Safety at Work Policy</p>
<p><b>MONITORING</b></p>	<p>Chief Executive Officer is responsible for the implementation of the policy</p>
<p><b>CONTACT FOR POLICY REVIEW AND CLARIFICATION</b></p>	<p>Chief Executive Officer is responsible for the periodic review of the policy and for dealing with any queries raised by staff on its implementation</p>
<p><b>RELATED LOCAL AUTHORITY AND OTHER EXTERNAL DOCUMENTS</b></p>	<p>As listed in the policy</p>

Signed: \_\_\_\_\_

Chair of the Board of  
Trustees

Date: \_\_\_\_\_

Signed: \_\_\_\_\_

Chief Executive Officer

Date: \_\_\_\_\_

