

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

PEOPLE CENTRED SUPPORT LIMITED



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Policy Statement

Modern Slavery is a serious crime and a gross violation of fundamental human rights. It encompasses slavery, servitude, forced or compulsory labour, and human trafficking. The organisation is committed to preventing modern slavery in all aspects of its operations, workforce, recruitment practices, service delivery, and supply chains.

As a regulated care provider, we recognise our responsibilities under the Modern Slavery Act 2015, the Care Act 2014, the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, and safeguarding legislation. We are committed to identifying, preventing, reporting, and responding appropriately to concerns relating to modern slavery, exploitation, abuse, and human trafficking. The organisation adopts a zero-tolerance approach to modern slavery and expects the same high standards from employees, volunteers, agency workers, contractors, suppliers, and business partners.

Definitions of Modern Slavery

Modern Slavery is an umbrella term used to describe offences under the Modern Slavery Act 2015, including:

Slavery

Person responsible for updating this policy: [Harry M Caulker]

Next Review Date: June 2027

In accordance with the Slavery Convention 1926, slavery is the status or condition of a person over whom powers associated with ownership are exercised. Although legal ownership of a person is not possible, slavery occurs where an individual is controlled and deprived of their freedom for another person's gain.

Servitude

Servitude involves an obligation to provide services imposed through coercion, threats, abuse of vulnerability, or exploitation. It includes situations where a person believes they cannot leave due to fear, intimidation, debt, or dependency.

The Policy

The organisation is committed to:

- Preventing modern slavery and exploitation within our services and supply chains.
- Ensuring all workers are recruited lawfully and treated fairly.
- Promoting safe recruitment and employment practices.
- Identifying and responding to safeguarding concerns involving modern slavery.
- Working with partner agencies to protect victims and potential victims.
- Supporting staff to recognise indicators of exploitation and report concerns promptly.
- Ensuring suppliers and contractors share our commitment to ethical working practices.

Forced or Compulsory Labour

Forced or compulsory labour is defined by the International Labour Organization (ILO) Forced Labour Convention as:

"All work or service which is exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily."

Indicators may include:

- Threats, intimidation, or coercion.
- Restriction of movement.
- Debt bondage.
- Withholding of wages.
- Retention of identity documents.
- Excessive working hours without consent.
- Dependence on an employer for accommodation, transport, or immigration status.

The organisation prohibits all forms of forced labour within its workforce and supply chain.

Human Trafficking

Human trafficking occurs when a person arranges or facilitates the travel, recruitment, transfer, harbouring, or receipt of another person for the purpose of exploitation.

Exploitation may include:

- Forced labour.
- Domestic servitude.
- Sexual exploitation.

- Criminal exploitation.
- Financial exploitation.
- Forced marriage.
- Organ harvesting.

A victim's consent is irrelevant where coercion, deception, abuse of power, or vulnerability is present.

The organisation recognises that victims may be adults or children and may be UK nationals or foreign nationals.

Child Labour

Child labour refers to work that deprives children of their childhood, education, health, dignity, or development.

The organisation will not knowingly engage suppliers or contractors that employ children in breach of UK law or international labour standards.

For providers supporting children or young people, any concerns regarding exploitation, trafficking, child criminal exploitation (CCE), child sexual exploitation (CSE), or modern slavery must be reported through safeguarding procedures immediately.

Compliance Requirements

The organisation will comply with all relevant legislation and regulatory requirements, including:

- Modern Slavery Act 2015.
- Care Act 2014.
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.
- Safeguarding Vulnerable Groups Act 2006.
- Employment Rights Act 1996.
- National Minimum Wage legislation.
- Immigration, Asylum and Nationality legislation.
- UK GDPR and Data Protection Act 2018.

CQC Requirements

The Care Quality Commission expects providers to:

- Protect people from abuse, neglect, discrimination, exploitation, and avoidable harm.
- Have effective safeguarding systems and processes.
- Recruit staff safely and lawfully.
- Ensure staff understand safeguarding responsibilities.
- Respond appropriately where modern slavery, exploitation, or trafficking is suspected.

Evidence of compliance may be reviewed during inspections under the Safe, Well-led and Effective quality statements.

Transparency in Supply Chains

Person responsible for updating this policy: [Harry M Caulker]

Next Review Date: June 2027

Section 54 of the Modern Slavery Act 2015 requires commercial organisations that:

- Supply goods or services;
- Carry on business in the UK; and
- Have an annual turnover of £36 million or more;

to publish an annual Modern Slavery Statement describing the steps taken to prevent modern slavery within their operations and supply chains.

The statement must:

- Be approved by the Board or equivalent governing body.
- Be signed by a Director, Partner, or Designated Member.
- Be published annually on the organisation's website.
- Be accessible from the homepage.

Where no steps have been taken, organisations must state this clearly.

Failure to comply may result in enforcement action through the courts. The Government also encourages publication through the Modern Slavery Statement Registry.

Smaller Organisations

Although organisations below the £36 million turnover threshold are not legally required to publish a Modern Slavery Statement, they are encouraged to adopt the principles of transparency, ethical procurement, and anti-slavery due diligence.

As a care provider, we recognise that commissioners, local authorities, Integrated Care Boards (ICBs), NHS organisations, and contractual partners may request evidence of our approach to modern slavery.

We therefore maintain this policy and implement proportionate measures to prevent modern slavery within our organisation and supply chain.

Reporting

All employees, agency workers, volunteers, contractors, and visitors have a duty to report concerns.

Where modern slavery, trafficking, exploitation, or forced labour is suspected, staff must:

1. Ensure immediate safety where there is a risk of harm.
2. Report concerns to their line manager or safeguarding lead immediately.
3. Follow safeguarding procedures where a service user may be at risk.
4. Contact emergency services if there is an immediate danger.

External reporting routes include:

- Police (999 emergency / 101 non-emergency).
- Local Authority Safeguarding Team.
- Modern Slavery & Exploitation Helpline: 08000 121 700.
- National Referral Mechanism (NRM) where appropriate.

Concerns may also be raised under the organisation's Whistleblowing Policy.

No employee will suffer detriment for raising genuine concerns in good faith.

Related Policies

- Adult Safeguarding
- Safeguarding Children
- Whistleblowing
- Recruitment and Selection
- Equality, Diversity and Inclusion
- Dignity and Respect
- Confidentiality
- Data Protection and Information Governance
- Good Governance
- Disciplinary Policy
- Agency Worker Policy
- Complaints Policy

Related Guidance

- Modern Slavery Act 2015
- Care Act 2014 Statutory Guidance
- CQC Safeguarding Guidance
- Home Office Modern Slavery Guidance
- National Referral Mechanism Guidance
- UK Government Transparency in Supply Chains Guidance
- Modern Slavery & Exploitation Helpline

Training Statement

All staff receive safeguarding and modern slavery awareness training as part of induction and ongoing mandatory training.

Training includes:

- Understanding modern slavery and human trafficking.
- Recognising indicators of exploitation.
- Reporting concerns.
- Safeguarding responsibilities.
- Whistleblowing procedures.
- Safe recruitment and employment practices.

Managers receive additional training to ensure they understand their responsibilities regarding safeguarding, workforce compliance, recruitment practices, and supply chain monitoring.

Training effectiveness is monitored through supervision, competency assessments, observations, audits, and refresher training.

Appendix A. Guidance for Writing a Statement Information to Include

Person responsible for updating this policy: [Harry M Caulker]

Next Review Date: June 2027

- Organisational structure.
- Nature of business operations.
- Supply chains.
- Policies relating to modern slavery.
- Risk assessment processes.
- Due diligence activities.
- Recruitment practices.
- Supplier monitoring arrangements.
- Staff training programmes.
- Safeguarding arrangements.
- Effectiveness measures and key performance indicators (KPIs).
- Future improvement plans.

Good Practice

- Use clear and accessible language.
- Keep information factual and evidence-based.
- Publish annually.
- Ensure Board approval.
- Make the statement easy to locate on the organisation's website.
- Consider publishing on the Government Modern Slavery Statement Registry.

Small Businesses

For smaller organisations such as ours, awareness, ethical recruitment, safeguarding vigilance, and supply chain due diligence remain essential.

We have in place:

- Robust recruitment and right-to-work checks.
- Enhanced DBS checks where appropriate.
- Safeguarding procedures for identifying exploitation.
- Monitoring of agency staffing arrangements.
- Supplier checks and procurement due diligence.
- Whistleblowing arrangements.
- Staff training on modern slavery and safeguarding.
- Processes for reporting concerns promptly.

Approval for this Statement

This statement was approved by:

Name: _____ John Gbongitta _____

Position: _____ Director _____

Date: _____ 08/06/2026 _____

Signature: _____ *j. gbongitta* _____