

Document Control

Document Number: PP/ACG/P-01

Version: 2

Version Issued: June 2020

**Modern Slavery and Human Trafficking Policy**

For the latest version of this policy please refer to the electronic location below or the website

Summary	This policy applies to all persons working for the Active Care Group or on its behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, agents, contractors and suppliers. This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Active Care Group has taken and is continuing to take to ensure that modern slavery is not taking place within its business or supply chain.
Scope	All Employees
Document Type	Policy <input checked="" type="checkbox"/> SOP <input type="checkbox"/> Guideline <input type="checkbox"/>
Verified by	Group People Director
Next Review Date	June 2022
Author	Senior People and Projects Partner
Lead Director	Group People Director
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1. Introduction

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2. The Group has a zero-tolerance approach to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.
- 1.3. The Group is also committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

2. Scope

- 2.1. This Policy applies to all directly and indirectly employed staff within Active Care Group and other persons working within the organisation.
- 2.2. This policy should be read in conjunction with Active Care Group policies as well as legislative and regulatory requirements.

3. Definitions

- 3.1. Modern Slavery is a serious and often hidden crime in which people are exploited for criminal gain. The impact can be devastating for the victims.
- 3.2. Modern slavery comprises slavery, servitude, forced and compulsory labour and human trafficking.

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- 3.3. The common factors are that a victim is, or is intended to be, used or exploited for someone else's (usually financial) gain, without respect for their human rights under four broad categories of labour exploitation, domestic servitude, sexual exploitation and criminal exploitation. The perpetrators seeking to take advantage of them could be private individuals, running small businesses or part of a wider organised crime network.
- 3.4. For adult victims, there will be some element of coercion involved, such as threats, use of force, deception, or abuse of power. For example, perpetrators may:
- Find out personal information about the victim and then use threats against their family in order to manipulate and control the victim.
 - Use the victim's fears about their immigration status to control them.
 - Deceive them with false promises of legitimate jobs.
- 3.5. There are many more examples. Victims may appear to give consent, but in reality, they have little ability to choose to leave the exploitative situation and the perpetrators have still committed a crime.
- 3.6. Child victims and vulnerable adults are not able to give informed consent and therefore exploitation even without any element of coercion could constitute modern slavery.

4. Responsibilities

4.1. Active Care Group

- 4.1.1. The Board of Directors have overall responsibility for ensuring this policy complies with the Group's legal and ethical obligations, and that all those under their control comply with it;
- 4.1.2. The Group's zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of a business relationship with them and reinforced as appropriate thereafter;
- 4.1.3. In order to assess the risk of modern slavery, the Group uses the following processes:
- Identify and assess potential risk areas when considering taking on new suppliers and regularly review existing supply chains;

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- Review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks;
- Protect whistle blowers.

4.2. Managers

- 4.2.1. Are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

4.3. Employees

- 4.3.1. All employees must ensure that they read, understand and comply with this policy.
- 4.3.2. The prevention, detection and reporting of modern slavery in any part of the Group or supply chain is the responsibility of all those working for the Group under its control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3.3. Employees must notify their manager soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 4.3.4. Employees are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of the Group or the supply chains of any supplier tier at the earliest possible stage.
- 4.3.5. If any employee believes or suspects a breach of this policy has occurred or that it may occur, they must notify their manager or report it in accordance with the Whistleblowing Policy as soon as possible.
- 4.3.6. If any employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chain constitutes any of the various forms of modern slavery, this should be raised with their manager in the first instance.

5. Guiding Principles

5.1. Indicators of Modern Slavery

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5.1.1. There are a number of indicators that can be signs that someone is a victim of modern slavery. Some of the key indicators are below. However sometimes it will be a case of acting on instinct that something is not right, and using existing professional skills to talk to a potential victim and find out more information. None of these indicators in isolation or combination can give complete certainty, however an employee does not need to be certain to report their concerns.

5.1.2. Indicators of a potential victim may include;

- Distrustful of authorities
- Expression of fear or anxiety
- Signs of psychological trauma (including post-traumatic stress disorder)
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Evidence of control over movement, either as an individual or as a group
- Restriction of movement and confinement to the workplace or to a limited area
- Passport or documents held by someone else
- Lack of access to medical care
- Limited social contact/isolation
- Limited contact with family
- Signs of ritual abuse and witchcraft (juju)
- Substance misuse
- Person forced, intimidated or coerced into providing services
- Doesn't know home or work address
- Perception of being bonded by debt
- Money is deducted from salary for food or accommodation
- Threat of being handed over to authorities
- Threats against the individual or their family members
- No or limited access to bathroom or hygiene facilities
- Unwanted/underage pregnancy

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- Inappropriate sexual behaviour
- Incoherent/changing account of events
- Repeating a story that you have heard elsewhere
- Unexplained eagerness to leave a safe space/to work

5.2. Reporting Modern Slavery

- 5.2.1. Where an employee suspects a case of modern slavery as described above, this must be reported to their line manager or follow the Whistleblowing Policy.
- 5.2.2. Additionally, the case should always be reported by one of the following methods:
- Phoning 999 if there is an immediate risk of harm
 - Reporting to the police on 101 or the Modern Slavery Helpline on 08000 121 700 if there is not an immediate risk of harm
- 5.2.3. An employee doesn't need to be sure that modern slavery is taking place or fully understand the types and definitions to report their concerns.
- 5.2.4. If an employee is subject to modern slavery the above 24-hour support helpline is available to contact if they do not feel confident to approach their line manager.

5.3. Breaches of this Policy

- 5.3.1. If any employee is found to be operating under the definition of the Modern Slavery Act they will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.3.2. The Group may terminate our relationship with other individuals and organisations working on its behalf if they breach this policy.

6. Policy Review Statement

- 6.1. This document may be reviewed at any time at the request of either an employee or management, but will automatically be reviewed 2 years from initial approval and thereafter on a biannual basis unless organisational changes, legislation, guidance or non-compliance prompt an earlier review.

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7. Associated Documents

- Whistleblowing Policy
- Code of Conduct
- Bribery and Corruption Policy
- Safeguarding Policies

8. Associated References and Further Guidance

- Modern Slavery Act 2015
- Anti-Bribery Act 2010

9. Audit and Monitoring

Objective	Lead	Measure	Frequency	Reporting
To report all slavery concerns through the whistleblowing or confidential events within radar	Quality Team or Quality and Governance Director	Radar	Monthly	Quality and Governance Report

10. Document Change History

Version	Description of revision (include reason for revision) <i>(Must list the last 5 amendments)</i>	Date of Revision
1	Initial Version	July 2019
2	Review of policy and reformat with new logo	June 2020

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