

MODERN SLAVERY POLICY

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Policy Number	ACG/Group/HR14
Version Number	03
Purpose	This policy: <ul style="list-style-type: none"> Sets out the steps that Active Care Group will take to ensure modern slavery is not taking place within our business or supply chains.
Scope	This policy applies to: <ul style="list-style-type: none"> All colleagues across the Active Care Group. Sites and services in England, Scotland and Wales.
Policy Owner	Karen Langton, Chief People Officer
Policy Ratified	Katie Gent, HR Business Partner on 06/08/2024
Policy Signed Off	Karen Langton, Chief People Officer on 07/08/2024
Date Issued	07/08/2024
Date for Review	06/08/2025
Electronic Location (EL)	Intranet/Sharepoint and Echo
Associated Policies	C&L09 Freedom to Speak Up Policy
Associated Standard Operating Procedures (SOPs)	



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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 to exploit them for personal or commercial gain.
- 1.2 Active Care Group (ACG) has a zero-tolerance approach to modern slavery and human trafficking, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

2 DEFINITIONS

- 2.1 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.
- 2.2 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.
- 2.3 For adult victims there will be some element of coercion involved such as threats, use of force, deception, or abuse of power.
- 2.4 Victims may appear to give consent but in reality they have little ability to choose to leave the situation.
- 2.5 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.

3 RESPONSIBILITIES

- 3.1 ACG's Executive Board have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under their control comply with it.
- 3.2 ACG's zero tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the outset of any business relationship and reinforced as appropriate thereafter.
- 3.3 We do not enter business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

4 REPORTING MODERN SLAVERY

- 4.1 Where a colleague suspects a case of modern slavery, this should be reported to their line manager or follow the Freedom to Speak Up policy (ACG/Group/HR05). Additionally, it should be reported by one of the following methods:
- Phoning 999 if there is an immediate risk of harm.
 - Reporting to the police by calling 101 if there is no immediate risk of harm.
- 4.2 We aim to encourage openness and will support anyone who raises a genuine concern in good faith, even if they turn out to be mistaken.

5 BREACHES OF THE POLICY

- 5.1 Colleagues should be aware that if they are found to be operating under the definition of the Modern Slavery Act, they will be subject to disciplinary action which could result in their dismissal.
- 5.2 ACG may terminate our relationship with other individuals or organisations working on its behalf if we believe a breach has occurred.

6 COMMUNICATION & AWARENESS

- 6.1 In accordance with Section 54 of the Modern Slavery Act 2015, ACG will develop and post on the company’s website an annual Modern Slavery Statement setting out the steps taken to ensure modern slavery is not taking place in our business and/or our supply chains.

7 EQUALITY IMPACT STATEMENT

- 7.1 This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any employee or applicant and it helps to promote equality in our services.

8 LEGISLATION

- 8.1 Modern Slavery Act 2015

9 ASSOCIATED DOCUMENTS

- 9.1 [Modern Slavery Statement](#)

10 DOCUMENT VERSION HISTORY

Version	Description of Revision	Date of Revision
01	New Groupwide policy	30/06/2022
02	Annual review of policy, no changes made. Modern Slavery Statement updated.	03/08/2023
03	Annual review of policy, no changes made. Modern Slavery Statement updated.	07/08/2024