Modern Slavery
Policy and Procedure

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Modern Slavery Policy and Procedure

Purpose of Policy

This Modern Slavery Policy outlines Comfort Care Recruitment and Training Limited's policy on how we will manage Modern Slavery concerns and promote the safety and welfare of people at risk of Modern Slavery and Human Trafficking.

To meet the legal requirements of the following legislation:

- Human Rights Act 1998
- The Care Quality Commission (Registration) Regulations 2009
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- The Care Act 2014
- The Modern Slavery Act 2015
- Data Protection Act 2018

To meet the following guidance:

- Modern Slavery: Statutory Guidance for England and Wales

Scope

The policy applies to:

- All employees, including those designated as temporary, bank staff, agency staff, volunteers or work experience

Objectives

The objectives of this policy are:

- To ensure compliance with legislation and regulations
- To ensure that employees can identify the signs of Modern Slavery
- To provide procedures for employees to follow in relation to reporting and managing Modern Slavery concerns and incidents
- To protect people's Human Rights

Definitions

Modern Slavery

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

Reference: Public Health England – Modern Slavery and Public Health - https://www.gov.uk/government/publications/modern-slavery-andpublichealth/modern-slavery-and-public-health

Types of Modern Slavery include:

- Labour Exploitation
- Sexual Exploitation
- Financial Exploitation
- Domestic Servitude
- Forced Criminality
- Organ Harvesting
- Forced Marriage

Human Trafficking

Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.

Reference: Crown Prosecution Service – Human Trafficking, Smuggling and Slavery - https://www.cps.gov.uk/legal-guidance/human-trafficking-smuggling-and-slavery Policy Statement

It is the policy of Comfort Care Recruitment and Training Limited to have a zero tolerance approach and to report all concerns relating to Modern Slavery and Human Trafficking.

Comfort Care Recruitment and Training Limited, as a Supported Living Service provider, will ensure that this Modern Slavery Policy dovetails with the Local Authority Safeguarding Adults Policy and that we comply with Local Safeguarding Protocols to ensure that people are not subject to abuse by experiencing modern slavery.

Comfort Care Recruitment and Training Limited is committed to ensuring people's Human Rights are respected and upheld in all areas of our business and in the provision of services.

Comfort Care Recruitment and Training Limited recognises our responsibilities as a business and as an employer set out in the Modern Slavery Act 2015 and will comply with these responsibilities.

Comfort Care Recruitment and Training Limited understands that only organisations that have a total annual turnover of £36 million are subject to the annual reporting requirements of the Modern Slavery Act 2015 and are required to publish a Modern Slavery Statement. In the event of Comfort Care Recruitment and Training Limited meeting this criteria we will fulfil our obligations.

Comfort Care Recruitment and Training Limited will report all concerns relating to Modern Slavery to the Police and to the Local Authority Safeguarding.

Comfort Care Recruitment and Training Limited is committed to ensuring that clients who use our services are not subject to Modern Slavery. Comfort Care Recruitment and Training Limited requires all employees to be vigilant and to immediately report all concerns of Modern Slavery to the Registered Manager without delay.

As an employer Comfort Care Recruitment and Training Limited has a duty of care to our employees and will report all concerns of exploitation of employees by third parties to the Police.

Comfort Care Recruitment and Training Limited will have robust recruitment processes and employment terms and conditions in place that comply with employment legislation and with minimum wage requirements.

It is the expectation of Comfort Care Recruitment and Training Limited that our suppliers and contractors of services or goods:

- Comply with the Modern Slavery Act 2015
- Have a Modern Slavery Policy and Procedure in place
- Pay the minimum wage or above
- Have not been convicted of modern slavery or forced labour offences

If Comfort Care Recruitment and Training Limited becomes aware that a contractor or supplier is employing people under Modern Slavery conditions we will terminate our contract and relationships with them and will report the concerns to the Police.

Comfort Care Recruitment and Training Limited will work in partnership with other agencies to manage Modern Slavery concerns.

Comfort Care Recruitment and Training Limited recognises our responsibilities in relation to confidentiality and data protection and will share information appropriately.
Comfort Care Recruitment and Training Limited will identify areas to improve practice by analysing all Modern Slavery reports to identify trends and lessons learned.

Comfort Care Recruitment and Training Limited is committed to ensuring confidentiality and data protection requirements in relation to Modern Slavery. All employees are required to follow the organisations Confidentiality Policy and Procedure and Data Protection Policy and Procedure.

It is the Policy of Comfort Care Recruitment and Training Limited that all our employees will complete training relating to Modern Slavery.

Comfort Care Recruitment and Training Limited is committed to implementing this Policy and the practices it sets out.

Procedure

Reporting Concerns of Modern Slavery and Human Trafficking

When employees become aware of concerns relating to Modern Slavery or Human Trafficking they must take the following action:

- Ensure the immediate safety of the person by assessing the immediate risk and taking action if the person, or others, are in danger
- If there is a medical emergency, imminent danger, or if a crime is being committed the emergency services must be called on 999
- If the situation is not life threatening but the person may need medical assistance, NHS 111 must be called
- If a crime is suspected leave the scene untouched if possible
- Reassure and support the person

The employee must inform the Registered Manager once the above actions have been taken. In the absence of the Registered Manager the employee must contact the designated person on call.

The employee must give the Registered Manager an account of what has happened and if there are any other people who could be at risk of harm.

The employee must complete a Safeguarding Report Form as soon as possible and forward this to the Registered Manager.

Referral to the Police and Local Authority Safeguarding

The Registered Manager must report the concerns to the Police without delay.

If the concern relates to an adult the Registered Manager must ensure that the Local Authority Safeguarding Adults referral process is followed.

If the concern relates to a child the Registered Manager must ensure that the Local Authority Safeguarding Children procedures are followed.

The Registered Manager is responsible for reporting the concerns to the Police and to the Local Authority. In the absence of the Registered Manager another member of the management team is responsible for reporting the concern.

Until a Modern Slavery and safeguarding referral has been closed by the Police and the Local Authority the Registered Manager must maintain contact with the Police and Local Authority to discuss the progress and outcome of the referral.

The Registered Manager must complete a management report detailing the actions they have taken to manage the Modern Slavery concern. The management report must contain details of the investigation outcome and any learning points.
The Registered Manager should maintain a log of all Modern Slavery concerns to enable analysis for trends.

Confidentiality and Information Sharing

When sharing information for Modern Slavery safeguarding purposes, Comfort Care Recruitment and Training Limited will ensure that:

- The person involved will be informed about the information that is recorded and will be asked to consent to share the information with the Police and Local Authority. If the person declines to share their information there may be occasions when it is justified to share the information if the person or others are at risk.
- All sharing of personal and sensitive information will be shared in compliance with the legal requirement of the Data Protection Act 2018 and the General Data Protection Regulations (GDPR).
- Employees must follow Comfort Care Recruitment and Training Limited's Data Protection Policy and Procedure.
- All employees will receive training on Data Protection and Confidentiality.

If an employee is unsure about what information they should share they must contact the Registered Manager for advice.

Care Quality Commission (CQC) Notifications

The Registered Manager must notify the Care Quality Commission without delay, of incidents of abuse and allegations of abuse, as well as any incident which is reported to or investigated by the Police.

The Registered Manager must ensure that in their absence there is a person delegated to complete CQC notifications.

Recruitment Checks

As part of Comfort Care Recruitment and Training Limited's safer recruitment processes and to minimise the risks of employing an applicant who is subject to Modern Slavery or Human Trafficking, all applicants are required to complete the following pre-employment checks:

- Right to Work Checks
- Identity Checks
- Disclosure and Barring Service (DBS) Checks
- Reference Checks
- Employment History Checks

Contractors and Suppliers

If Comfort Care Recruitment and Training Limited becomes aware that a contractor or supplier is employing people under Modern Slavery conditions or is involved in Human Trafficking, the Registered Manager must report the concerns to the Police.

The Registered Manager must inform the Nominated Individual.

The Registered Manager must write to the contractor or supplier to terminate the contract.

Modern Slavery Annual Statement

If Comfort Care Recruitment and Training Limited meets the criteria for organisations that are required to publish a Modern Slavery Statement the Nominated Individual will complete this on behalf of the Provider.
The Nominated Individual must ensure that the Modern Slavery Statement is published on Comfort Care Recruitment and Training Limited's website and that a copy is displayed at the service.

The Nominated Individual must review this on an annual basis.

Roles and Responsibilities

All employees are responsible for:

- Following the Modern Slavery Policy and Procedure.
- Completing training relating to Modern Slavery.
- Recognising and reporting concerns related to Modern Slavery to the Registered Manager without delay.
- Completing written reports relating to Modern Slavery concerns.

- Being aware of the Local Authority's Safeguarding Policies and Procedures for safeguarding adults and safeguarding children.
- Understanding the principles of confidentiality and information sharing in line with local and government guidance.

The Registered Manager is responsible for:

- Ensuring this Modern Slavery Policy and Procedure is implemented.
- Ensuring good governance and management of Modern Slavery concerns within Comfort Care Recruitment and Training Limited.
- Managing Modern Slavery concerns and incidents and identifying learning points from these.
- Being a point of contact for clients, stakeholders and others to contact to report concerns relating to Modern Slavery.
- Reporting Modern Slavery concerns to the Local Authority.
- Completing CQC Notifications relating to Modern Slavery.
- Ensuring that employees receive Modern Slavery Training appropriate for their role.
- Updating the Provider/Nominated Individual about Modern Slavery concerns and incidents.
- Terminating contracts with contractors and suppliers if they are involved in Modern Slavery or Human Trafficking.

The Provider/Nominated Individual is responsible for:

- Maintaining oversight of how Modern Slavery is managed.
- Reviewing learning points with the Registered Manager.
- Providing appropriate supervision and support to the Registered Manager.
- Ensuring that an annual Modern Slavery Statement is published when the organisation meets the eligibility criteria.

Breaches of Policy

For employees, failure to adhere to the Modern Slavery Policy and Procedure could lead to possible disciplinary action being taken.

For others (volunteers, agency staff, contractors) their individual relationship with the organisation may be terminated. Monitoring and Review

This Policy will be reviewed annually or sooner if necessary due to legislative or regulatory requirements.