

POLICY TITLE: MODERN SLAVERY 2015

Amendment Page no:	Date	Paragraphs/ Page Amended	Initials
1	15.04.2016	Implementation of policy	JG
2	17.04.2017	Review of Policy	JG
3	17.04.2018	Review of Policy	JG
4	17.04.2019	Review of Policy	NH
5	03.07.2019	Address change	NH

1. Purpose

- 1.1 To ensure that Emergency Personnel Homecare is aware of the issues surrounding slavery and human trafficking and has a policy and procedure in place to identify, and if applicable report on issues surrounding slavery and human trafficking.
- 1.2 To support Emergency Personnel Homecare in meeting the following key lines of enquiry.
- 1.3 To meet the legal requirements of the regulated activities that Emergency Personnel Homecare is registered to provide.

2. Scope

- 2.1 The following roles may be affected by this policy.
 - All staff
 - Registered Manager
 - Owner, proprietor or responsible individual

3. Objectives

- 3.1 To promote awareness of concerns surrounding slavery and human trafficking
- 3.2 To publicly state Emergency Personnel Homecare's commitment to addressing slavery and human trafficking in all its forms
- 3.3 To define Emergency Personnel Homecare's response to any incidence of slavery or human trafficking
- 3.4 If applicable to publish an annual statement on slavery and human trafficking.

4. Policy

- 4.1 Compliance is necessary from 29th October 2015. However, if Emergency Personnel Homecare's year end falls between 29th March 2015 and 30th March 2016. Emergency Personnel Homecare will not be required to publish a statement for the 2015/2016 financial year.
- 4.2 Guidance suggests that's statements should be published within six months of the financial year end. Therefore, those with a financial year end of 31st March 2016 will be the first required to publish a statement by 30th September 2016.

- 4.3 It is unlikely that Emergency Personnel Homecare will experience cases of slavery or human trafficking, but this policy details the commitment to raise awareness and defines a process to address issues if they do arise.
- 4.4 The Modern Slavery Act 2015 states that every organisation providing goods and services in the UK with a total global annual turnover of £36m or more will be required to produce a slavery and human trafficking statement for each financial year.
- 4.5 This figure £36m is the total turnover of the organisation or its group not the individual location. As such the publication of an annual statement (if applicable) will primarily be the responsibility of the senior management of the organisation, but individual services will contribute to the content of the statement and have an awareness of the issues of slavery and human trafficking.
- 4.6 All staff will be made aware of the issues surrounding slavery and human trafficking and encouraged and supported to report any concerns to the management of Emergency Personnel Homecare.
- 4.7 Emergency Personnel Homecare will ensure that staff are only employed whose credentials can be confirmed.
- 4.8 Emergency Personnel Homecare will be open and transparent with all staff and encourage discussion about slavery and human trafficking. The service will also support any staff that may be subject to slavery or human trafficking.
- 4.9 Slavery and human trafficking are classed as abuse and indicators could be:
- Signs of physical or emotional abuse
 - Appearing to be malnourished, unkempt or withdrawn
 - Isolation from the community, seeming under the control or influence of others
 - Living dirty, cramped or overcrowded accommodation and/or living and working at the same address
 - Lack of personal effects or identification documents
 - Always wearing the same clothes
 - Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
 - Fear of law enforcers
- 4.10 institutions of slavery or human trafficking being identified, Emergency Personnel Homecare will share this information with the appropriate authorities with the objective of preventing future situations arising, and to promote the elimination of routes and sources of slavery or human trafficking.

5. Procedure

- 5.1 If Emergency Personnel Homecare has a turnover of more than £36m then the annual statement will be published and will include detail on:
- Its structure, business and supply chains
 - Its policies in relation to slavery and human trafficking
 - Its due diligence processes in relation to slavery and human trafficking in its business and supply chains
 - The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps that it has taken to assess and manage that risk
 - Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.
 - The training about slavery and human trafficking available to its staff.
- 5.2 The statement should be:
- Written in simple language
 - Enough, but cover all relevant points and link to relevant documents
 - In English but may be provided in other languages that are relevant to the supply chain
 - The statement must include either a statement of the steps Emergency Personnel Homecare has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains and in any of its own business, or that Emergency Personnel Homecare has taken no such steps.

- 5.3 The statement needs to be published and any director signing the statement needs to be satisfied that the statement is true. This might include carrying out full investigations.
- 5.4 Charities and educational institutions are captured by the obligation. If the turnover is £36 million, goods or services are supplied, and it carries on business within the UK, it is irrelevant the purpose for which its profits are made. Both franchisors and franchisees may be captured if they meet the turnover thresholds.
- 5.5 The statement should be published on Emergency Personnel Homecare's website and, where appropriate linked through to any other relevant websites of Emergency Personnel Homecare.
- 5.6 It must be obvious on the homepage or clearly accessible by a drop-down menu.
- 5.7 If a parent company meets the requirements, it must include in its statement the steps taken in relation to each of its subsidiaries if they form part of the parent's supply chain or business (even if the subsidiaries themselves do not meet all the requirements).
- 5.8 A subsidiary organisation that meets the thresholds must produce its own slavery and human trafficking statement. However, a parent company may produce one statement that the subsidiaries also use.
- 5.9 All staff engaged with providing services at Emergency Personnel Homecare will be subject to thorough and rigorous recruitment procedures that will include a DBS check, identity check, confirmation of validity to work in the UK, employment history, suitability for the role and references. This should minimise the chance of employing a person that has been/subject to slavery or human trafficking.
- 5.10 Emergency Personnel Homecare will only use staff provided by third party organisations (such as agencies) that are registered with the regulator and who can confirm that the staff being supplied are free to work in the UK and meet all the requirements for the role being provided for.
- 5.11 All staff will receive information about slavery and human trafficking.
- 5.12 Staff will be advised that if they are subject to slavery or human trafficking, or if they are aware of any individual that may be subject to slavery or has been trafficked, or if slavery or human trafficking is disclosed to them they should inform the Registered Manager of Emergency Personnel Homecare or the Police.

6. Definitions

6.1 Slavery:

Slavery, in accordance with the 1826 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ownership of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom.

6.2 Human Trafficking:

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult, in addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual or non-sexual exploitation.