

# Modern Slavery and Human Trafficking Policy





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Summary	This policy ensures compliance with the Modern Slavery Act 2015, along with underpinning our approach to any situation where we become aware of modern slavery and or human trafficking within the organisation.
Related Policies	Whistleblowing Safeguarding children and adults at risk Inclusion and Diversity Anti-Harrassment and Bullying Recruitment Employee privacy notice
Target audience	All employees, casual workers, agency workers, clients and stakeholders
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## 1. Policy Statement

1.1 This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that we have taken and are continuing to take to ensure that modern slavery is not taking place within our business or supply chain.

1.2 Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We have a zero tolerance approach to any form of modern slavery and human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chains.

1.3 This policy describes the values, principles and procedures that underpin our approach to any situation where we become aware of, or have evidence of, involvement or the risk of involvement, direct or indirect, in enterprises that subject people to conditions that meet current definitions of modern slavery, human trafficking and forced labour.

1.4 We implement our business strategy in an ethically, socially and environmentally responsible manner. We fully acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights (IBHR). The IBHR informs all of our policies related to the rights and freedoms of every individual who works for us, either directly or indirectly through our supply chain.

1.5 We are developing policies and processes which are intended to extend these commitments through our supply chain. As a healthcare provider we recognise our responsibility to identify any clients who may be a victim of modern slavery or human trafficking, and we will ensure we adhere to our robust safeguarding procedures in work with our partners in following local modern slavery processes.

## 2. Definitions

2.1 Slavery, following the 1926 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 they did own the person, which deprives the victim of their freedom.

2.2 Servitude is the obligation to provide services that are imposed by the use of coercion and includes the obligation of a serf to live on another person's property and the impossibility of changing their condition.

2.3 Forced or compulsory labour is defined in international labour law by the International Labour Organisation (ILO) Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. Work or service is



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exactod from any person under the menace of any penalty and for which the person has not offered themselves voluntarily.

2.4 Human Trafficking is when 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 travel. This reflects the fact that a victim may be deceived by the promise of a better life or job, or maybe a child who is influenced to travel by an adult. In addition, the exploitation of a 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 of exploiting them for sexual exploitation or non-sexual exploitation

## 3. Our policies

3.1 We operate a number of policies to ensure that we are conducting business in an ethical and transparent manner. These include:

3.2 Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed workforce, to safeguard against human trafficking or individuals being forced to work against their will.

3.3 Equal opportunities (within our Inclusion and Diversity policy). We have a range of controls to protect our workforce from poor treatment and/or exploitation, which complies with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.

3.4 Safeguarding policies. We adhere to the principles inherent within both our safeguarding adults and children's policies. These provide clear guidance so that our employees are clear on how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.

3.5 Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.

3.6 Standards of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

## 4. Signs of Modern Slavery and Human Trafficking

4.1 Everyone should be aware of the following potential indicators:

4.2 Restricted Freedom:

- Not in possession of their passports or other travel/identity documents
- Unable to leave their work environment



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- Show signs that their movements are being controlled
- Unable to move freely
- Be threatened with being handed over to authorities
- Limited contact with families or people outside their immediate environment

## 4.3 Behaviour:

- Unfamiliar with the local language
- Act as if instructed by someone else
- Allow others to speak for them when addressed directly
- Be distrustful of authorities
- Show fear or anxiety
- Have limited or no social interaction

## 4.4 Working Conditions:

- Have no contract
- Unable to negotiate working conditions
- Work excessively long hours over long periods
- Do not have any days off
- Lack basic training or professional licences

## 4.5 Financial:

- Receive little or no payment
- Have no access to their earnings
- Be disciplined through fines
- Be under the perception that they are bonded by debt
- Be charged for services they don't want or need

## 5. Clients

5.1 Routes Healthcare will endeavour to ensure no vulnerable young person or adult in our care is subject to any conditions that meet the Care Act (and similar) definitions of modern slavery. If the service hub has any suspicions, information, or evidence that any of its clients are victims of, or at risk of, becoming victims of modern slavery, exploitation or forced labour, it will take immediate protective action by alerting the appropriate safeguarding authority or police and apply all safeguarding procedures that then follow

## 6. Reporting Procedures

6.1 When it is believed there is a possibility of a modern slavery situation, it must in the first instance be reported to their manager who will then take it forward by reporting it to the



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Modern Slavery Helpline via telephone, 08000 121 700, or online at <https://www.modernslaveryhelpline.org/report>

6.2 All concerns will be treated with confidentiality and handled according to safeguarding procedures.

## 7. Training

7.1 Information and training about modern slavery and human trafficking is available to our workforce through our mandatory safeguarding children and adults training programmes, our safeguarding policies and procedures, and our Nominated Individual.

## 8. Contractors & Suppliers

8.1 We deal with several outside organisations as suppliers of goods and services. We know that these organisations might form part of a longer supply chain. We make all reasonable efforts to ensure that no link in the supply chain is producing goods and services made under conditions of modern slavery or which might involve human trafficking.

8.2 We expect all our contractors and suppliers to have a similar zero-tolerance and due diligence approach to modern slavery and human trafficking and only work with organisations that have a robust anti-modern slavery policy that operate in other parts of their supply chain and who comply with the Modern Slavery Act 2015.

8.3 We explain in our replies to businesses who respond to tenders and adverts for goods and services that we will check if they employ people under conditions of modern slavery and if they do similar checks with other businesses in their supply chain.

8.4 Individuals, particularly those responsible for procuring goods and services, are expected to report any concerns about any issue or suspicion of modern slavery in any part of their dealings at the earliest possible stage.

## 9. KPIs

9.1 We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from our workforce, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- All workforce complete mandatory training on safeguarding children and adults which encompasses modern slavery awareness.
- Regular audits of our supply chain show compliance with modern slavery requirements.