UT COMPLIANCE

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Modern Slavery Policy

UT Compliance

SUPPORTED LIVING

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1. Scope

This Modern Slavery Policy applies to all employees, agency staff, volunteers, contractors, and suppliers associated with 's adult supported living services across England. It covers all settings where services are provided, including shared living accommodations, individual service user homes, and any off-site facilities where staff operate. The policy is also applicable to all external agencies and organisations that have a contractual or partnership relationship with , including recruitment agencies, training providers, and subcontractors.

The purpose of this policy is to ensure that maintains a zero-tolerance approach to modern slavery and human trafficking in all forms. The policy outlines the steps will take to prevent, identify, and address any concerns related to modern slavery within its operations and supply chains. This includes implementing robust recruitment practices, raising awareness among staff and service users, and providing clear guidance on how to report concerns. The policy is designed to comply with CQC Regulation 13, the Modern Slavery Act 2015, and other relevant legislation, and aims to safeguard the rights, dignity, and well-being of all individuals connected to .

This policy underpins 's commitment to promoting a safe and ethical working environment where all individuals are treated fairly and with respect. Compliance with this policy is mandatory for all staff and partners, and any breaches will be addressed through disciplinary or contractual measures. This policy should be read in conjunction with 's Safeguarding, Whistleblowing, and Recruitment policies to ensure a comprehensive approach to preventing and addressing modern slavery and exploitation.

2. Legal and Regulatory Framework

Term/Regulation	Description/Definition
Care Quality Commission (Regulated Activities) Regulations 2014, xRegulation 13: Safeguarding Service Users from Abuse and Improper Treatment	Regulation 13 requires to protect service users from abuse and improper treatment, including modern slavery and human trafficking. This includes having systems and processes in place to prevent exploitation and ensure that any concerns are identified and addressed promptly.
Modern Slavery Act 2015	The Modern Slavery Act 2015 consolidates offences related to slavery, servitude, forced or compulsory labour, and human trafficking. It requires businesses to take steps to prevent modern slavery within their operations and supply chains and to publish an annual modern slavery statement outlining the actions taken.
Human Rights Act 1998	The Human Rights Act 1998 protects the fundamental rights and freedoms of individuals, including the right to freedom from slavery, servitude, and forced or compulsory labour. must ensure that its policies and practices respect these rights and do not contribute to or condone any form of exploitation.
Equality Act 2010	The Equality Act 2010 provides protection from discrimination based on protected characteristics and promotes equality and fairness in all aspects of service delivery and employment. It supports the principle of non-exploitation and ensures that everyone is treated with dignity and respect.
Health and Social Care Act 2008 (Regulated Activities) Regulations 2014	Regulation 18 of this Act requires to deploy sufficient numbers of suitably qualified, competent, skilled, and experienced staff. This includes ensuring that recruitment practices are transparent and do not contribute to exploitation or forced labour.

Public Interest Disclosure Act 1998 (Whistleblowing)	The Public Interest Disclosure Act 1998 protects individuals who raise concerns about illegal, unethical, or unsafe practices, including modern slavery and human trafficking. must ensure that staff are able to report concerns without fear of retaliation.
Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)	These regulations govern how personal data is collected, processed, stored, and shared. must ensure that all data related to recruitment, employment, and service delivery is handled in compliance with these regulations, and that personal information is not used to exploit or control individuals.

3. Definitions of Key Terms

Term	Definition
Modern Slavery	The exploitation of people through coercion, threats, or deception, depriving them of their freedom and rights. It includes slavery, servitude, forced or compulsory labour, and human trafficking. Modern slavery can occur in any industry or sector and affects individuals of all ages, genders, and backgrounds.
Human Trafficking	The recruitment, transportation, transfer, harbouring, or receipt of people through force, fraud, or deception, with the aim of exploiting them for profit. Human trafficking is a form of modern slavery and often involves exploitation for labour, sexual exploitation, or domestic servitude.
Forced Labour	Any work or service that individuals are forced to do against their will, under the threat of punishment or retaliation. Forced labour is characterised by the loss of freedom and is often associated with coercion, debt bondage, or control over individuals' movements.
Exploitation	The act of taking unfair advantage of individuals for personal or financial gain. Exploitation can include forced labour, sexual exploitation, domestic servitude, and other forms of abuse that deny individuals their rights and dignity.
Coercion	The use of threats, force, or manipulation to control individuals and make them act against their will. Coercion is a common tactic used in modern slavery to maintain control over victims and prevent them from seeking help.
Safeguarding	The process of protecting individuals, particularly those who are vulnerable, from harm, abuse, or exploitation. Safeguarding involves preventing risks, identifying concerns, and taking action to support and protect individuals who are at risk of harm.
Whistleblowing	The act of reporting concerns about illegal, unethical, or unsafe practices, including modern slavery and human trafficking. Whistleblowers are protected by law and should not face retaliation for raising concerns in good faith.
Victim	An individual who has been subjected to modern slavery, human trafficking, or exploitation. Victims may experience physical, psychological, or emotional harm as a result of their exploitation and often require specialised support to recover and rebuild their lives.
Supply Chain	The network of individuals, organisations, and resources involved in the production and distribution of goods or services. Modern slavery can occur at any stage of the supply chain, and businesses must take steps to ensure that their supply chains are free from exploitation.

4. Policy Statement

is committed to maintaining a zero-tolerance approach to modern slavery and human trafficking in all forms. This Modern Slavery Policy is designed to ensure that complies with CQC Regulation 13, the Modern Slavery Act 2015, and other relevant legislation. The policy sets out clear expectations for staff, contractors, and partners to prevent, identify, and respond to any form of modern slavery or exploitation within 's operations and supply chains.

The purpose of this policy is to provide guidance on the procedures for preventing and addressing modern slavery, promoting a culture of transparency and accountability, and ensuring that all individuals associated with are treated fairly and with respect. recognises that modern slavery is a hidden crime that can be difficult to identify, and is committed to taking proactive steps to safeguard the rights of individuals at risk.

This policy outlines the steps will take to conduct due diligence on its supply chains, train staff to recognise the signs of modern slavery, and provide clear reporting mechanisms for raising concerns. It also sets out the responsibilities of all staff in promoting an ethical working environment, supporting victims, and ensuring that remains free from exploitation. Any breach of this policy will be treated as a serious disciplinary matter and may result in termination of employment or contracts.

will regularly review and update this policy to ensure that it remains aligned with current legislation, CQC requirements, and best practice. By implementing this policy, aims to create a safe and supportive environment where the rights and dignity of all individuals are protected, and where modern slavery is actively prevented and addressed.

5. Roles and Responsibilities

This section outlines the specific roles and responsibilities of all individuals and teams involved in implementing and upholding 's Modern Slavery Policy. Clear delineation of responsibilities ensures that there is accountability at every level of the organisation and that all staff understand their role in preventing, identifying, and responding to modern slavery. The table below details the key roles and their corresponding responsibilities.

Role	Responsibilities
Board of Directors	Ensure that maintains a zero-tolerance approach to modern slavery and sets a positive example for the rest of the organisation. Oversee the implementation of the Modern Slavery Policy and ensure that all strategic decisions are aligned with the policy's principles. Monitor compliance through regular reviews and ensure that modern slavery is considered in risk management processes.
Registered Manager	Lead on the implementation of the Modern Slavery Policy within the service. Ensure that all staff are aware of the policy and their responsibilities under it. Conduct risk assessments to identify any areas of the service or supply chain that may be at risk of modern slavery. Report any concerns or incidents to the board and external authorities as required. Support staff in recognising and responding to modern slavery and provide guidance on how to follow reporting procedures.
HR Manager	Implement safe and transparent recruitment processes that prevent modern slavery and exploitation. Ensure that all employees are recruited in accordance with fair employment practices, and that all checks (e.g., right to work, reference checks) are completed before employment begins. Oversee the training and development of staff regarding modern slavery, and provide support in managing any internal investigations related to allegations of modern slavery.

Line Managers	Promote awareness of modern slavery within their teams and support staff in implementing the policy. Conduct regular supervision sessions to discuss any concerns related to modern slavery or exploitation. Report any concerns or incidents to the Registered Manager and ensure that staff feel confident in raising concerns without fear of retaliation. Implement any actions required to address gaps identified through audits or risk assessments.
Training and Development Lead	Develop and deliver training programs on modern slavery, ensuring that all staff are equipped to recognise the signs of modern slavery and know how to respond appropriately. Conduct regular reviews of training content to ensure it is aligned with current legislation and best practice. Ensure that all new staff complete mandatory training on modern slavery as part of their induction, and that refresher training is provided annually.
All Staff	Adhere to 's Modern Slavery Policy and report any concerns about modern slavery, exploitation, or unethical practices. Participate in training and supervision related to modern slavery. Ensure that their practice upholds the principles of fairness, transparency, and respect for human rights. Be vigilant for any signs of modern slavery within the service or supply chains and follow reporting procedures if any concerns arise.
Service Users and Families	Report any concerns related to modern slavery or exploitation to . Provide feedback on how modern slavery is being addressed within the service. Participate in discussions about service quality and contribute to the development of safe and transparent care practices.
Contractors and Suppliers	Comply with 's Modern Slavery Policy and ensure that their own supply chains are free from modern slavery and exploitation. Provide evidence of compliance when requested and notify of any concerns or incidents related to modern slavery.

6. Procedures

The following procedures outline the specific steps that will take to implement the Modern Slavery Policy, prevent modern slavery within its operations and supply chains, and respond to any concerns or incidents. These procedures are designed to ensure compliance with CQC Regulation 13, the Modern Slavery Act 2015, and other relevant legislation, while promoting a person-centred approach to safeguarding.

1. Recruitment and Employment Practices

Robust recruitment and employment practices are essential to prevent modern slavery and exploitation. is committed to ensuring that all recruitment processes are fair, transparent, and free from coercion or exploitation.

- **Safe Recruitment**: All job advertisements, application processes, and interviews must be conducted in accordance with 's Recruitment Policy, which promotes fairness and equality. All candidates must provide proof of identity and right to work in the UK, and at least two references must be obtained before employment begins.

- **Verifying Employment Status**: The HR Manager is responsible for verifying that all employees have the legal right to work in the UK. If any concerns arise during the verification process, the matter must be referred to the Registered Manager for further investigation.

- **Prevention of Coercion and Exploitation**: will not use recruitment agencies or subcontractors that charge recruitment fees or require candidates to work in conditions that restrict their freedom. Contracts must clearly outline the terms and conditions of employment, and all employees must be provided with a written statement of employment before starting their role.

2. Due Diligence in Supply Chains

recognises that modern slavery can occur at any stage of the supply chain, and is committed to taking proactive steps to prevent exploitation in its procurement practices. This procedure outlines the steps will take to assess and monitor its suppliers and contractors.

- **Supplier Risk Assessments**: All new and existing suppliers must undergo a risk assessment to identify any potential areas of concern related to modern slavery. The risk assessment will consider factors such as the location of operations, the nature of the work, and the supplier's own policies and procedures.

- **Supplier Code of Conduct**: All suppliers and contractors must sign 's Supplier Code of Conduct, which sets out expectations regarding ethical practices, compliance with the Modern Slavery Act 2015, and the prohibition of forced or compulsory labour. Suppliers must provide evidence of compliance upon request.

- **Ongoing Monitoring and Audits**: The HR Manager will conduct regular audits of key suppliers to ensure that they are complying with 's Modern Slavery Policy and their own legal obligations. This may involve site visits, interviews with workers, and review of documentation. Any concerns identified during audits must be addressed through a formal action plan.

3. Identifying and Responding to Concerns

All staff must be vigilant for any signs of modern slavery or exploitation and must follow the reporting procedures outlined below if they have any concerns. Early identification and intervention are crucial for safeguarding the rights and well-being of individuals at risk.

- **Recognising the Signs of Modern Slavery**: Staff should be aware of common indicators of modern slavery, such as:
  - Unexplained injuries or signs of physical abuse.
  - Lack of personal identification or documentation.
  - Isolation from family and friends.
  - Reluctance to seek help or speak out.
  - Evidence of control over movement, finances, or accommodation.

- **Reporting Concerns**: Concerns about modern slavery must be reported immediately to the Registered Manager or HR Manager. If the concern relates to a service user, the Safeguarding Policy must also be followed to ensure that the individual is protected from harm.

- **Responding to Concerns**: Upon receiving a report of modern slavery, the Registered Manager will conduct an initial risk assessment to determine the appropriate response. This may include notifying external agencies (e.g., local authority safeguarding team, police) and ensuring that the individual is removed from any situation that poses a risk to their safety.

- **Supporting Victims**: is committed to supporting victims of modern slavery. This includes providing access to specialist services (e.g., counselling, legal advice), ensuring that their immediate needs are met, and involving external agencies as appropriate. All actions taken must be in line with the individual's best interests and respect their rights and autonomy.

4. Record-Keeping and Documentation

Accurate and comprehensive record-keeping is essential for ensuring transparency and accountability in modern slavery procedures.

- **Documenting Concerns and Actions Taken**: All concerns related to modern slavery must be documented using 's incident reporting form. The record should include a detailed description of the concern, the actions taken, and any follow-up required.

- **Confidentiality and Data Protection**: All records related to modern slavery must be handled in accordance with the Data Protection Act 2018 and UK GDPR. Information should only be shared with authorised individuals and external agencies when necessary to protect the safety and rights of individuals.

7. Training and Development

Training and development are integral components of 's strategy to maintain a zero-tolerance approach to modern slavery and to ensure compliance with CQC Regulation 13 and the Modern Slavery Act 2015. Comprehensive training helps staff and associated personnel recognise the signs of modern slavery, understand their responsibilities under the law, and respond appropriately to concerns. This section outlines the detailed requirements for training and development, including mandatory induction training, ongoing professional development, specialist training for key roles, and competency assessments.

Mandatory Induction Training

All new staff, including permanent employees, agency workers, and volunteers, must complete mandatory modern slavery training as part of their induction. The purpose of this training is to provide a solid foundation of knowledge about modern slavery, outline the legal and ethical responsibilities of , and ensure that staff know how to recognise and report concerns.

- **Core Induction Modules**: Induction training must cover the following topics:
  - **Introduction to Modern Slavery and Human Trafficking**: Staff will learn about the different forms of modern slavery, including forced labour, human trafficking, domestic servitude, and sexual exploitation. The module will also include real-world case studies to illustrate the various ways in which modern slavery can manifest in supported living services.

  - **Legal and Regulatory Obligations**: An overview of the Modern Slavery Act 2015 and CQC Regulation 13, including the legal duties of care providers to prevent, identify, and address modern slavery. The training will emphasise that failing to act on suspected modern slavery can result in legal consequences for individuals and .

  - **Recognising the Signs of Modern Slavery**: A detailed breakdown of the physical, behavioural, and situational indicators of modern slavery. This module will use interactive scenarios and role-plays to help staff identify subtle warning signs and distinguish them from other issues such as mental health or domestic abuse.

  - **Reporting Procedures**: Step-by-step guidance on how to report concerns using 's internal reporting systems and external whistleblowing channels. Staff will also learn about the role of external agencies, such as the National Referral Mechanism (NRM), local safeguarding boards, and the police.

  - **Supporting Victims of Modern Slavery**: Training on how to provide immediate support to suspected victims, including how to conduct sensitive conversations, maintain confidentiality, and involve specialist support services. Staff will be trained on the importance of a trauma-informed approach, which recognises the potential psychological impact of modern slavery.

- **Format and Delivery**: The induction training will be delivered through a combination of face-to-face workshops, e-learning modules, and interactive group discussions. Each session will be tailored to the specific roles and responsibilities of participants, ensuring that they understand how modern slavery relates to their work in supported living services.

- **Competency Assessments**: At the end of the induction training, staff must complete a competency assessment to demonstrate their understanding of the core topics. The assessment will include multiple-choice questions, scenario-based

exercises, and reflective questions to gauge staff confidence in identifying and responding to modern slavery. Staff who do not pass the assessment will receive additional training and support until they achieve the required competency level.

Ongoing Professional Development

Ongoing training is essential to ensure that staff remain up-to-date with the latest developments in modern slavery prevention and best practices. All staff must complete annual refresher training, which will revisit core topics and address any new challenges or changes in legislation. This training will be tailored to the specific needs of different roles and may include specialised modules for staff in leadership or safeguarding roles.

- **Annual Refresher Training**: Refresher training will be mandatory for all staff and must include updates on any changes to the Modern Slavery Act 2015, CQC guidance, and 's internal policies. Refresher training will focus on emerging trends in modern slavery, such as the use of technology in human trafficking or the exploitation of vulnerable adults in supported living settings. For example, if new forms of exploitation are identified, such as the use of financial coercion, the refresher training will include targeted modules on recognising and addressing these risks.

- **Role-Specific Training**: Staff in specific roles, such as managers, safeguarding leads, and HR personnel, will receive additional training tailored to their responsibilities. This may include:
    - **Advanced Safeguarding Training**: In-depth training on how to conduct risk assessments, handle complex disclosures, and manage multi-agency safeguarding meetings. Safeguarding leads will be trained on how to act as a central point of contact for modern slavery concerns and liaise with external agencies.

    - **HR and Recruitment Training**: HR staff will receive specialist training on preventing modern slavery in recruitment and employment practices. This includes how to identify red flags in CVs and job applications, ensure that recruitment agencies comply with 's standards, and conduct thorough right-to-work checks.

- **Specialist Training for Senior Leaders**: Senior leaders and board members will receive training on strategic approaches to preventing modern slavery, including how to implement effective governance structures, conduct organisational risk assessments, and ensure that modern slavery is considered in strategic decision-making. This training will focus on their role in setting a positive example, promoting transparency, and ensuring that modern slavery is embedded into 's quality assurance framework.

Competency Assessments and Supervision

Competency assessments and regular supervision are essential to ensuring that training translates into effective practice. All staff involved in modern slavery prevention must undergo regular competency assessments and supervision sessions to evaluate their understanding and ability to apply the training in their roles.

- **Initial Competency Assessment**: All new staff must complete an initial competency assessment at the end of their induction training. This assessment will involve a combination of written tests, role-play scenarios, and reflective discussions to ensure that they have a comprehensive understanding of modern slavery and can respond effectively to concerns.

- **Ongoing Competency Assessments**: Competency assessments will be conducted at least annually and whenever a staff member's role changes significantly. The assessments will include direct observation of practice, review of documentation, and feedback from service users and colleagues. For example, a competency assessment for a safeguarding lead may involve observing their ability to manage a complex safeguarding case involving suspected modern slavery.

- **Supervision Sessions**: Supervision provides a structured opportunity for staff to reflect on their practice, discuss any concerns, and identify areas for further development. Supervision sessions will be conducted every six to eight weeks and

will include a specific focus on safeguarding and modern slavery. Supervisors should use these sessions to provide feedback on how well staff are implementing the Modern Slavery Policy, address any challenges they are facing, and support them in building their skills and confidence.

Supporting Continuous Professional Development (CPD)

recognises the importance of supporting staff to pursue continuous professional development (CPD) opportunities related to modern slavery and safeguarding. CPD helps staff stay informed about the latest research, legislative changes, and best practices, and promotes a culture of continuous learning and improvement.

- **Access to External Training and Conferences**: Staff will be supported to attend external training courses, workshops, and conferences on modern slavery and human rights. For example, may fund places on accredited courses such as the "Certificate in Anti-Slavery and Human Trafficking" or workshops run by specialist organisations such as the Anti-Slavery Partnership.

- **Mentoring and Peer Support**: Where appropriate, staff may be paired with mentors who have expertise in safeguarding and modern slavery. Mentoring relationships can provide valuable support for staff dealing with complex cases and help them build their skills and confidence. Peer support groups will also be established to provide a safe space for staff to share experiences, discuss challenges, and develop best practices in a supportive environment.

- **Promoting Research and Knowledge Sharing**: is committed to contributing to the wider body of knowledge on modern slavery prevention. Staff will be encouraged to engage in research, publish articles, and participate in knowledge-sharing forums. This may include presenting at conferences, contributing to industry publications, or participating in collaborative research projects with external partners.

8. Monitoring and Review

Monitoring and reviewing the Modern Slavery Policy is essential for ensuring that maintains a proactive and effective approach to preventing modern slavery, protecting service users and staff, and complying with legal and regulatory requirements. A robust monitoring and review process enables to evaluate the effectiveness of its policy, identify areas for improvement, and implement necessary changes in response to evolving risks, legislation, and best practice. This section outlines a comprehensive framework for ongoing monitoring, data analysis, stakeholder engagement, and formal policy review.

Internal Audits and Compliance Checks

Internal audits are a critical component of the monitoring process, providing an in-depth evaluation of 's compliance with its Modern Slavery Policy and relevant legal and regulatory standards. Audits will be conducted by the HR Manager, Registered Manager, or a designated compliance officer at least annually, or more frequently if there are significant changes to the policy, complaints, or identified risks.

- **Scope of Audits**: Each audit will cover all aspects of the Modern Slavery Policy, including recruitment and employment practices, supply chain management, training compliance, and reporting procedures. The audit will involve:
  - Reviewing recruitment records to verify that pre-employment checks are conducted thoroughly, and all staff are legally employed and fairly compensated.
  - Assessing supplier records to ensure that all contractors and subcontractors comply with 's Supplier Code of Conduct and have implemented measures to prevent modern slavery in their operations.
  - Conducting spot checks on service delivery to identify any potential risks or concerns related to modern slavery, such

as unexplained absences or unusual behaviour patterns in staff or service users.

- **Audit Methodology**: The audit process will involve a combination of document reviews, staff and service user interviews, direct observations, and supplier site visits where necessary. For example, a compliance officer may conduct interviews with service users to gauge their satisfaction with staff interactions and ensure that they are not being coerced or exploited in any way.

- **Audit Reporting**: The findings of each audit will be documented in a formal audit report, which must include:
  - A summary of areas of compliance and non-compliance.
  - Identification of any potential risks or gaps in practice.
  - Specific recommendations for action.
  - A risk rating system to prioritise issues based on their severity and potential impact on service users or staff.

- **Action Plan Development**: Following the audit, a formal action plan will be developed to address any identified issues. The action plan must outline:
  - The actions required to resolve the issue.
  - The individuals responsible for implementing the actions.
  - The timeline for completion.
  - Monitoring mechanisms to ensure that actions are completed effectively.

- **Follow-Up and Continuous Improvement**: Progress against the action plan will be reviewed regularly by the Registered Manager or compliance officer. If issues are not resolved within the agreed timeframe, further investigation and escalation may be necessary. The results of the audits and any corrective actions will be shared with staff and included in annual quality assurance reports.

Data Analysis and Performance Metrics

will implement a data-driven approach to monitoring compliance with the Modern Slavery Policy. Key performance indicators (KPIs) and other metrics will be established to track progress, identify trends, and inform strategic decision-making.

- **Establishing KPIs**: KPIs related to modern slavery may include:
  - **Training Compliance**: Percentage of staff who have completed mandatory modern slavery training and refresher courses.
  - **Incidents and Concerns**: Number and nature of concerns reported related to modern slavery or exploitation, and the time taken to resolve these issues.
  - **Supply Chain Due Diligence**: Percentage of suppliers who have completed 's Supplier Risk Assessment and signed the Supplier Code of Conduct.
  - **Risk Assessments Conducted**: Frequency and outcomes of risk assessments conducted for new and existing suppliers, service areas, and operational procedures.

- **Using Data to Inform Practice**: Data collected through KPIs and other monitoring activities will be analysed regularly and used to identify patterns, trends, or recurring issues. For example, if data shows an increase in modern slavery concerns in a particular service area, may need to conduct a targeted review and provide additional training or support in that area.

- **Benchmarking Against Best Practice**: will benchmark its performance against industry standards and best practice guidelines to ensure that it remains at the forefront of modern slavery prevention. This may involve participating in external equality and diversity networks or using recognised accreditation frameworks such as the "Stronger Together" programme.

Stakeholder Engagement and Feedback

Stakeholder engagement is a key component of the monitoring and review process, providing valuable insights into the effectiveness of the Modern Slavery Policy from the perspective of staff, service users, and external partners. Regular feedback mechanisms will be established to ensure that the views and experiences of all stakeholders are considered in evaluating the policy's implementation.

- **Staff Surveys and Focus Groups**: Staff will be invited to participate in regular surveys and focus groups to share their experiences of promoting the Modern Slavery Policy in their roles. Feedback topics may include the effectiveness of training, support from management, and any barriers they face in implementing the policy.

- **Service User and Family Consultations**: Service users and their families will also be consulted regularly to gather feedback on their experiences and perceptions of safety, respect, and dignity. For example, may conduct in-depth interviews with service users who have been identified as particularly vulnerable to explore whether their needs are being met and whether they feel safe and supported.

- **Supplier and Partner Feedback**: Contractors, suppliers, and external partners will be encouraged to provide feedback on their experiences of working with and their perceptions of its commitment to modern slavery prevention. This may involve surveys, interviews, or participation in supplier forums.

Formal Policy Review

The Modern Slavery Policy will be reviewed at least annually, or sooner if there are changes in legislation, CQC guidance, or best practice. The review process will be led by the HR Manager in collaboration with the Registered Manager and senior management, and where appropriate, external consultants with expertise in modern slavery prevention.

- **Review Process**: The review process will include:
  - **Legislative and Regulatory Updates**: A review of any changes in legislation or guidance that may impact the policy, such as amendments to the Modern Slavery Act 2015 or new CQC standards.

  - **Stakeholder Consultation**: Engagement with staff, service users, suppliers, and external partners to gather feedback on the current policy and identify any gaps or areas for improvement.

  - **Impact Assessment**: An assessment of the impact of the policy on promoting modern slavery prevention, including analysis of KPIs, audit findings, and stakeholder feedback.

- **Documenting and Communicating Changes**: Any changes to the policy will be documented in a formal policy update report, which will outline the rationale for the changes, the impact on staff and service users, and the plan for implementation. All staff will be required to sign a declaration confirming that they have read and understood the updated policy.

9. Reporting Concerns

Promoting a Culture of Openness and Transparency

is committed to creating a culture where staff, service users, and their families feel empowered to raise concerns about modern slavery or exploitation without fear of retaliation. The aim is to ensure that any issues related to modern slavery are addressed promptly, transparently, and effectively. Staff must feel confident that their concerns will be taken seriously, investigated

thoroughly, and result in appropriate action.

Types of Concerns to Report

Concerns that should be reported under this policy include:

- **Suspected Modern Slavery**: Any suspicion that an individual is being subjected to forced labour, human trafficking, domestic servitude, or any other form of modern slavery.

- **Unethical Employment Practices**: Any evidence of unfair or exploitative employment practices, such as withholding wages, coercing individuals into work, or restricting freedom of movement.

- **Inappropriate Behaviour by Suppliers or Contractors**: Any evidence that a supplier or contractor is involved in modern slavery or is not complying with 's Supplier Code of Conduct.

Reporting Mechanisms

provides multiple channels for reporting concerns, ensuring that staff, service users, and their families can choose the most appropriate and confidential method for raising issues:

- **Verbal Reporting to Line Managers**: Staff and service users are encouraged to speak directly to their line manager or the Registered Manager about any concerns. Managers are responsible for documenting the concern, taking appropriate action, and providing feedback to the individual raising the concern.

- **Written Reporting**: Concerns can be documented using 's incident reporting form or through a written statement submitted to the HR department. Written reports should include a detailed description of the concern, the individuals involved, and any evidence or documentation that supports the concern.

- **Anonymous Reporting**: If individuals feel unable to report concerns through standard channels, they may use the anonymous reporting mechanism provided by . This mechanism involves submitting a report through a secure online platform or using a designated confidential post box. Anonymous reports will be treated as seriously as named reports, and a thorough investigation will be conducted based on the information provided.

Policy Approval & Review

APPROVED BY	SIGNATURE *No signature on file*
REVIEW DATE **1 January 1970**	NEXT REVIEW DATE **17 February 2027**