

MODERN SLAVERY POLICY AND PROCEDURES



SERVICE 24 SUPPORT LIMITED

**THE CLOCKTOWER, PARK ROAD, BESTWOOD VILLAGE,
NOTTINGHAM, NG6 8TQ.**

REGISTERED MANAGER

KWASI ABEAM-DANSOH

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1.0 PURPOSE

The purpose of the Modern Slavery Policy and Procedures for Service 24 Support Limited is to ensure that the organization adopts a strong, proactive, and comprehensive approach to combat modern slavery, human trafficking, and exploitation. This policy seeks to uphold human rights, dignity, and safety while fostering a culture of respect and transparency. It ensures compliance with the Modern Slavery Act 2015, Care Quality Commission (CQC) regulations, and Data Security and Protection Toolkit (DSPT), among other relevant UK legislation, in order to protect individuals from abuse and exploitation throughout the organization's operations.

1.1 Compliance with CQC Regulations

The policy is designed to align with the Care Quality Commission (CQC) regulations, which require care providers to ensure the safety and well-being of vulnerable individuals, including the protection of staff and Service Users from any form of exploitation or abuse. CQC standards mandate that care providers implement safeguarding measures to protect individuals from harm, including modern slavery.

This policy ensures that:

- **Staff Training:** All staff members, including care workers, will undergo regular training to raise awareness of modern slavery and equip them with the skills to identify signs of exploitation, coercion, or trafficking in Service Users or colleagues.
- **Safeguarding Procedures:** Service 24 Support Limited will adopt safeguarding procedures in compliance with CQC guidance, ensuring that vulnerable Service Users are protected from any form of exploitation or modern slavery.
- **Operational Compliance:** Established procedures will allow staff to report concerns about modern slavery within care settings, ensuring that victims or potential victims receive the necessary protection and support.
- **Audit and Monitoring:** Regular internal audits will be conducted to ensure compliance with CQC safeguarding standards and the organization's specific obligations related to modern slavery prevention.

1.2 Data Security and Protection Compliance

Service 24 Support Limited is committed to maintaining the highest standards of data security and protection in line with the Data Security and Protection Toolkit (DSPT). We recognize the importance of securing personal and sensitive data, particularly when dealing with cases of modern slavery. The Data Protection Act 2018 and General Data Protection Regulation (GDPR) mandate that the organization safeguards personal data against unauthorized access, loss, or misuse.

The policy incorporates:

- **Confidentiality:** Any disclosures related to modern slavery will be handled with the utmost confidentiality to protect the privacy of victims and the integrity of sensitive information.
- **Secure Data Management:** Robust systems will be in place to ensure that all personal, medical, and legal data related to modern slavery cases is securely managed and protected.

- Sensitive Data Handling: Staff involved in the investigation and reporting of modern slavery cases will be trained on data security protocols to ensure the safe handling of sensitive data.
- Reporting and Access Controls: Strict access controls will be implemented to limit access to sensitive information to authorized personnel only. All disclosures and reports will be tracked and documented to ensure proper management.

1.3 Ensuring Transparency in Supply Chains and Operations

Service 24 Support Limited is dedicated to ensuring transparency in all aspects of its operations, particularly concerning recruitment, service delivery, and supply chain management. We recognize that modern slavery can manifest in supply chains, including third-party contractors, service providers, and vendors. This policy ensures that all suppliers and contractors comply with anti-modern slavery provisions as stipulated in the Modern Slavery Act 2015.

The policy outlines:

- Supplier Audits: Service 24 Support Limited will conduct regular audits of suppliers and contractors to verify that they comply with anti-modern slavery practices. Suppliers will be required to demonstrate compliance with the Modern Slavery Act by providing evidence of their own policies and practices to prevent exploitation.
- Procurement Procedures: Our procurement process will ensure that only suppliers who meet ethical labour practices and human rights standards are engaged.
- Transparency and Accountability: Service 24 Support Limited will hold all contractors, suppliers, and service providers accountable, ensuring they adhere to our anti-modern slavery expectations and taking appropriate action in the event of non-compliance.

1.4 Identifying and Responding to Modern Slavery Risks

Service 24 Support Limited will implement a risk-based approach to identify, assess, and manage potential modern slavery risks within its operations and supply chains. This policy ensures:

- Ongoing Risk Assessments: Regular risk assessments will be conducted to identify areas of vulnerability to modern slavery, particularly in high-risk areas such as recruitment and supply chains, and specific sectors where exploitation is more likely to occur.
- Incident Reporting Procedures: Clear procedures will be established for reporting suspected incidents of modern slavery, including a confidential reporting system available to employees, Service Users, and external parties.
- Immediate Action: When modern slavery is suspected, appropriate investigations will be initiated promptly. Relevant authorities, such as the National Crime Agency (NCA), Gangmasters and Labour Abuse Authority (GLAA), and local law enforcement, will be notified to ensure effective action.
- Victim Protection: The safety and well-being of potential victims will always be the top priority. Victims will be immediately referred to the National Referral Mechanism (NRM) and provided with the necessary support and services.

1.5 Victim Support and Referral Mechanisms

In compliance with the Modern Slavery Act 2015, Service 24 Support Limited will ensure that identified victims of modern slavery receive immediate and appropriate support and protection. This includes:

- **Referral to Support Services:** Victims will be referred to specialized support services, including legal, medical, and psychological assistance, through established channels such as the National Referral Mechanism (NRM).
- **Collaboration with Anti-Slavery Organizations:** Service 24 Support Limited will collaborate with law enforcement, NGOs, and specialized anti-slavery organizations to ensure victims are properly supported and their rights are upheld.
- **Victim-Centered Approach:** The organization will adopt a victim-centered approach, ensuring that all actions taken prioritize the individual's best interests, dignity, and safety, throughout the support process.

1.6 Employee and Stakeholder Engagement

Service 24 Support Limited is committed to fostering a culture of vigilance and responsibility by engaging all employees, contractors, and stakeholders in the fight against modern slavery. The policy outlines:

- **Staff Training:** Regular training programs will be implemented for all employees to help them recognize the signs of modern slavery, understand how to report concerns, and respond appropriately to suspected cases of exploitation.
- **Whistleblowing Mechanism:** A robust whistleblowing policy will be established to allow staff, contractors, and external parties to report concerns about modern slavery, ensuring these concerns are addressed in a timely and confidential manner without fear of retaliation.

1.7 Continuous Improvement and Accountability

Service 24 Support Limited is committed to ensuring that the Modern Slavery Policy and Procedures remain effective and responsive to emerging risks. This includes:

- **Annual Review:** The policy will be reviewed annually to evaluate its effectiveness, identify areas for improvement, and ensure that it remains in line with evolving legislation and best practices.
- **Monitoring Mechanisms:** Monitoring tools will be utilized to track the policy's effectiveness, including auditing procedures, tracking reported incidents, and ensuring timely resolution.
- **Designated Modern Slavery Officer:** A Modern Slavery Officer will be appointed to oversee the implementation and monitoring of this policy, ensuring compliance across all areas of the organization.

2.0 SCOPE

The scope of the Modern Slavery Policy and Procedures for Service 24 Support Limited covers all aspects of the organization's operations, ensuring that modern slavery, human trafficking, and exploitation are prevented, identified, and addressed effectively. This policy applies across every area of the organization, including the workforce, service delivery, supply chains, contractors, external partners, and relevant stakeholders. It ensures compliance with national regulations, ethical standards, and best practices in safeguarding individuals from exploitation.

The policy aligns with CQC regulations, the Data Security and Protection Toolkit (DSPT), and other relevant UK institutions to ensure the highest standards of protection for individuals at risk of modern slavery, safeguard personal data, and guarantee transparency and accountability across all operational areas.

2.1 Employees

The policy applies to all individuals directly employed by Service 24 Support Limited, including full-time, part-time, temporary, and casual employees. This is crucial as modern slavery risks are not just external but can also manifest within the organization's workforce. The policy ensures that modern slavery is not part of any aspect of the employee lifecycle, from recruitment to employment.

Recruitment and Employment Practices

- **Transparency in Hiring:** Service 24 Support Limited guarantees clear and transparent hiring processes where all candidates are fully informed about their rights, job responsibilities, and remuneration. During the recruitment process, the eligibility of all candidates to work legally in the UK will be verified through appropriate documentation checks.
 - All potential employees will be informed about the terms and conditions of employment and provided with a copy of their contract detailing the nature of their employment.
- **Equal Opportunity Employment:** Service 24 Support Limited adheres to anti-discrimination policies in recruitment, ensuring that no individual is coerced or manipulated into taking up employment. This policy mandates that no discrimination, abuse, or exploitation occurs during hiring.
 - **Anti-forced Labour Screening:** Part of the recruitment process will involve checks to identify any potential indicators of forced labour practices, including a clear confirmation that potential employees are freely choosing to work with the organization.
- **Vetting and Background Checks:** To prevent any exploitation or involvement in modern slavery, Service 24 Support Limited will implement comprehensive background checks for all new employees. These checks will include:
 - **Verification of References:** To ensure the legitimacy of prior employment history and that no past involvement in exploitative practices or modern slavery exists.
 - **Criminal Background Screening:** All staff will undergo criminal background checks to identify any connections to exploitative or criminal activities related to trafficking or slavery.

Employment Contracts and Terms

- **Clear Contracts:** Employees will be provided with clear and legally binding contracts that outline the terms of employment, including salary, hours, duties, and entitlements. These contracts will ensure that employees understand their rights and avoid any exploitation.
 - Contracts will explicitly state the agreed compensation, working hours, and benefits.
- **Fair Working Conditions:** The policy ensures that all employees work in safe, fair, and respectful conditions, with no excessive working hours or improper control over their personal lives. This includes:
 - **Fair Wages:** Service 24 Support Limited guarantees that employees are paid fairly for their work and that pay is in compliance with national minimum wage laws.
 - **Adequate Breaks:** All employees will be entitled to rest periods, annual leave, and breaks in accordance with the law and employment standards.

Training and Awareness

- **Modern Slavery Awareness Training:** Service 24 Support Limited will provide all employees with regular training focused on modern slavery. This training will enable staff to:
 - Identify signs of exploitation or trafficking among themselves, their colleagues, or Service Users.
 - Understand their responsibilities in reporting suspicions of modern slavery and exploitation through established whistleblowing channels.

2.2 Contractors and Subcontractors

The policy applies to third-party individuals or entities engaged by Service 24 Support Limited, including subcontractors, consultants, and service providers. These contractors must adhere to the same standards as internal staff in preventing modern slavery and exploitation.

Contractual Clauses

- **Adherence to the Modern Slavery Act 2015:** All contracts with contractors, subcontractors, and suppliers will include specific clauses that require compliance with the Modern Slavery Act 2015. This mandates contractors to demonstrate that they have policies and practices in place to prevent modern slavery.
 - **Ongoing Monitoring and Audits:** Contractors must provide evidence of their compliance with anti-slavery practices, and their operations may be subject to audits and investigations to ensure adherence to these provisions.

Due Diligence

- **Pre-Engagement Checks:** Before engaging contractors or subcontractors, Service 24 Support Limited will perform due diligence to ensure they adhere to ethical labour practices. This includes reviewing contractors' policies, employee treatment, and compliance with anti-slavery standards.

- Labour Practices: Contractors must provide information on how they ensure no forced or child labour is used in their operations. Service 24 Support Limited will verify that contractors have systems in place to prevent labour exploitation or coercion.

Ongoing Monitoring and Compliance

- Annual Reporting: Contractors and subcontractors will be required to provide annual compliance reports. These reports will demonstrate that contractors remain compliant with modern slavery policies and provide updates on their ongoing anti-slavery initiatives.
 - Investigation of Allegations: If any concerns regarding modern slavery are raised, contractors will cooperate with Service 24 Support Limited to facilitate investigations and address any violations immediately.

2.3 Service Users

This policy applies to the protection of Service Users, who may be at risk of modern slavery and exploitation. Service 24 Support Limited is dedicated to safeguarding vulnerable individuals, ensuring that they receive care that is free from any form of modern slavery.

Safeguarding Vulnerable Individuals

- Identification of At-Risk Individuals: Staff will be trained to recognize the signs of modern slavery and human trafficking, particularly in Service Users who may be more vulnerable, such as those with disabilities, mental health issues, or individuals who are isolated.
 - This includes identifying physical signs of abuse, coercion, fear, and dependency that are common indicators of modern slavery.
- Protection from Exploitation: Service 24 Support Limited will implement safeguarding protocols to ensure that Service Users are not coerced or manipulated into modern slavery. These protections will apply in all environments, including residential care settings, outreach services, and any form of in-home care.

Support and Referrals

- Immediate Response: When modern slavery is suspected, staff will follow a clear and effective response protocol, including immediate referral of the individual to the National Referral Mechanism (NRM) and other specialized support services.
 - This ensures that Service Users receive comprehensive support including legal assistance, housing, and psychological care.
- Confidentiality and Advocacy: Service 24 Support Limited will ensure that the privacy and dignity of Service Users are maintained at all times, and that individuals are empowered to make decisions regarding their care and recovery. Victims will be assisted in navigating the legal system and accessing the appropriate support networks.

2.4 Suppliers and Supply Chain

The policy extends to suppliers, vendors, and any third-party partners that engage with Service 24 Support Limited to provide services or goods. This is an essential aspect, as modern slavery can often be hidden within supply chains.

Supplier Due Diligence

- **Compliance Checks:** Service 24 Support Limited will conduct thorough due diligence and risk assessments on all suppliers before engaging them. Suppliers must demonstrate their compliance with the Modern Slavery Act 2015, provide evidence of policies, and show that they are free from modern slavery practices.
- **Supplier Audits:** Service 24 Support Limited will regularly audit suppliers to ensure ongoing compliance with modern slavery prevention measures. Audits will assess not only the supplier's practices but also the conditions of workers within the supplier's operations.

Procurement Practices

- **Ethical Procurement:** All procurement processes will prioritize suppliers who can prove they uphold ethical labour practices and meet high standards for modern slavery prevention.
 - This includes evaluating supplier practices in their recruitment, labour conditions, and treatment of employees to ensure they meet the ethical standards required by Service 24 Support Limited.
- **Supplier Agreement Terms:** Supplier contracts will include explicit clauses that mandate compliance with the Modern Slavery Act 2015. Additionally, Service 24 Support Limited reserves the right to terminate contracts with suppliers who are found to be involved in modern slavery practices.

2.5 Operations

The policy applies to all operational activities conducted by Service 24 Support Limited, from recruitment and care services to operational procedures and training.

Recruitment and Employment

- Recruitment processes will be thoroughly vetted to prevent any exploitative practices. The policy ensures that Service 24 Support Limited follows clear hiring standards, including transparency and fair wages, to ensure protection against modern slavery.

Care Services

- The policy ensures that all care services, whether provided directly by employees or subcontracted to external providers, meet high standards and protect against any form of exploitation.

Operational Procedures

- Operational staff will be trained to identify signs of modern slavery, including identifying signs of coercion, control, or manipulation in employees, contractors, or Service Users. There will be clear reporting channels in place for staff to raise concerns and for the organization to act promptly on any suspicion.

2.6 Geographical Coverage

The scope of this policy extends across all locations where Service 24 Support Limited operates, both within the UK and internationally, to ensure consistent and effective efforts to combat modern slavery.

Domestic Operations

- This policy applies to all care homes, outreach services, recruitment processes, and other care-related services operated within the UK. Whether it is residential care facilities, assisted living, or services delivered directly in Service Users' homes, the policy ensures all care environments are safe and free from modern slavery.

International Operations

- If Service 24 Support Limited expands or partners with organizations outside the UK, this policy will be adapted to ensure compliance with local laws as well as UK regulations. It ensures similar standards of anti-slavery practices are enforced globally, preventing modern slavery in overseas operations.

3.0 POLICY STATEMENT

At Service 24 Support Limited, we are deeply committed to maintaining the highest standards of integrity and fairness across all aspects of our operations. As a healthcare provider, we recognize the significant responsibility we bear to safeguard vulnerable individuals from exploitation and abuse, especially the insidious practices of modern slavery and human trafficking. These abuses not only undermine human dignity but also place vulnerable individuals at risk within our care and workforce. Our Modern Slavery Policy and Procedures underscore our unwavering commitment to addressing modern slavery in all its forms, ensuring that no individual in our care or workforce is subjected to exploitation, forced labour, trafficking, or abuse.

This policy is not only a demonstration of our dedication to ethical care and labour standards, but it also aligns with national legislative frameworks and best practices, reinforcing our commitment to compliance, transparency, and accountability. Below, we expand on the various elements of the policy that guide our proactive approach to eliminating modern slavery.

3.1 Compliance with Legislation and Regulations

Service 24 Support Limited ensures that we meet or exceed the requirements set forth by both national UK legislation and regulatory bodies that govern the prevention of modern slavery. This includes:

- **Modern Slavery Act 2015:** We are fully compliant with the Modern Slavery Act 2015, which mandates organizations to prevent slavery and human trafficking within their operations and supply chains. We will publish an annual Modern Slavery Statement detailing our actions and progress toward eliminating modern slavery, as required by the Act.
- **Care Quality Commission (CQC) Regulations:** As a healthcare provider, we adhere to the CQC regulations, which emphasize the importance of safeguarding vulnerable Service Users. Our modern slavery policy aligns with CQC's fundamental standards, particularly in safeguarding, ensuring that the services we provide are free from any form of exploitation or abuse.
- **Gangmasters and Labour Abuse Authority (GLAA):** We comply with the GLAA, which works to protect workers from exploitation, including modern slavery, in industries that provide temporary or seasonal labour. This includes ensuring that our own practices, as

well as those of our suppliers and contractors, meet the highest standards of labour rights protection.

- National Crime Agency (NCA) and Independent Anti-Slavery Commissioner: We cooperate with NCA and the Independent Anti-Slavery Commissioner to share information and intelligence to prevent and detect modern slavery and human trafficking. Our proactive measures for identifying and responding to exploitation reflect this partnership with national authorities.
- Data Security and Protection Toolkit (DSPT): To ensure compliance with GDPR and the Data Protection Act 2018, we safeguard any personal and sensitive data concerning modern slavery cases. This includes ensuring that any data related to victims of modern slavery is handled confidentially, securely, and in compliance with the Data Security and Protection Toolkit (DSPT).

3.2 Organizational Commitment to Eliminating Modern Slavery

We are committed to taking a holistic, proactive approach to the elimination of modern slavery, ensuring that we implement both preventative measures and responsive actions across our operations. This commitment extends to all areas of our business, including:

- Recruitment and Employment: We will ensure that all recruitment practices are free from exploitation, and that employees and contractors are not coerced into work or subjected to abusive practices. We will:
 - Verify eligibility to work in the UK for all potential employees, ensuring that they have the legal right to work.
 - Provide fair employment contracts outlining pay, working hours, and conditions, and ensure that all workers are treated with respect and dignity.
 - Vetting processes will include background checks to identify any association with exploitative labour practices, modern slavery, or human trafficking.
- Service Delivery: As a healthcare provider, we are acutely aware of the risks modern slavery poses to Service Users. We will take every measure to protect the individuals we care for by:
 - Training staff to identify the signs of exploitation and modern slavery among Service Users.
 - Creating a supportive environment where Service Users feel safe to report any abuse or concerns they may have.
 - Ensuring that no individual receiving care is coerced, manipulated, or subjected to forced labour or trafficking in any form, within or outside of the care settings.
- Supply Chains: We recognize that modern slavery can be hidden within global supply chains, and we are committed to ensuring that all third-party suppliers and contractors adhere to strict ethical standards. This will include:
 - Due diligence processes for vetting new suppliers, ensuring they adhere to modern slavery prevention standards.

- Ethical sourcing practices, where we will prioritize working with suppliers who share our commitment to ethical labour standards and transparency in their operations.
- External Partnerships: We work closely with various external stakeholders, including government agencies, law enforcement, and NGOs such as Anti-Slavery International and the Human Trafficking Foundation, to:
 - Strengthen our response mechanisms to modern slavery concerns.
 - Collaborate on training programs and educational initiatives to raise awareness about modern slavery and human trafficking in our sector.

3.3 Prevention, Identification, and Reporting

Service 24 Support Limited has established robust procedures for preventing, identifying, and responding to cases of modern slavery. These procedures are critical in upholding our duty to protect the individuals we serve and ensuring we provide a safe working environment for our staff.

- Prevention Measures: We will:
 - Develop a culture of awareness by providing ongoing training for all employees, including recognition of modern slavery signs in the workplace and within Service User environments.
 - Adopt a zero-tolerance policy towards any form of exploitation, trafficking, or coercion within our workforce or supply chain.
 - Conduct risk assessments across our operations and supply chain to identify and mitigate potential risks of modern slavery, particularly in high-risk sectors.
- Identification of Modern Slavery: Employees and contractors will be trained to:
 - Recognize signs of exploitation, trafficking, and forced labour within the organization and its services.
 - Report any suspicions of modern slavery through confidential reporting mechanisms, ensuring the safety and privacy of individuals involved.
- Reporting and Response: We will ensure that:
 - Clear reporting channels are in place for both employees and Service Users to raise concerns regarding modern slavery without fear of retaliation.
 - All reports of suspected modern slavery will be investigated promptly, and if a case is confirmed, it will be referred to the National Referral Mechanism (NRM) and relevant authorities for further investigation and support.
 - We will provide victims of modern slavery with immediate access to legal, medical, and psychological support, working with specialized agencies to ensure their recovery.

3.4 Transparency and Accountability

As part of our commitment to transparency, Service 24 Support Limited will:

- **Publish an annual Modern Slavery Statement:** This will detail the steps we have taken to identify and prevent modern slavery, and we will update this statement regularly to reflect our ongoing efforts.
- **Monitor and Review:** We will regularly monitor the effectiveness of this policy, including conducting audits, reviewing compliance, and gathering feedback from stakeholders. Any necessary adjustments will be made to ensure the policy's continued relevance and effectiveness.
- **Accountability Structures:** A designated Modern Slavery Officer will be responsible for overseeing the implementation of the policy and will regularly report to senior management and the board on its effectiveness. This officer will also liaise with law enforcement and regulatory bodies as needed.

3.5 Support for Victims of Modern Slavery

At Service 24 Support Limited, we recognize the importance of offering comprehensive support to individuals who are victims of modern slavery. We are committed to ensuring that victims are provided with:

- **Access to Support Services:** This includes legal support, healthcare, psychological assistance, and access to safe housing. We will work closely with NGOs and specialized agencies to ensure that victims have the resources they need to recover and rebuild their lives.
- **Victim-Centred Approach:** Our approach ensures that victims are treated with dignity and respect, and their safety and well-being are prioritized in every step of the response process.

3.6 Continuous Improvement and Policy Review

Service 24 Support Limited is committed to continuous improvement in the fight against modern slavery. To ensure the effectiveness of this policy, we will:

- Review the policy annually to ensure it remains aligned with legal requirements, best practices, and feedback from stakeholders.
- Audit and evaluate compliance regularly, ensuring that all employees, contractors, and suppliers understand and adhere to the policy.
- Update training programs regularly to reflect new trends, risks, and best practices in the prevention of modern slavery.

4.0 OBJECTIVES

The Modern Slavery Policy and Procedures for Service 24 Support Limited are designed with specific, actionable objectives to ensure that the healthcare provider operates in a way that actively prevents, identifies, and responds to modern slavery in all its forms. These objectives ensure full compliance with the Modern Slavery Act 2015, CQC regulations, and other relevant national UK institutions, ensuring the protection of vulnerable individuals and the highest standards of care, while effectively combating modern slavery within the organization, service delivery, and supply chains.

4.1 Ensure Legal and Regulatory Compliance

To ensure full compliance with the Modern Slavery Act 2015, CQC regulations, and other relevant national and international regulations, including those set by the Gangmasters and Labour Abuse Authority (GLAA), the National Crime Agency (NCA), and the Independent Anti-Slavery Commissioner.

Actions:

- **Publish an Annual Modern Slavery Statement:** Service 24 Support Limited will adhere to the Modern Slavery Act 2015 and publish an annual statement outlining the measures taken to combat modern slavery in its workforce and supply chains. This statement will be made publicly available, ensuring transparency.
- **Adhere to CQC Regulations:** We will align our operations with CQC's safeguarding standards, ensuring that Service Users are protected from any form of exploitation. This includes embedding modern slavery prevention into safeguarding practices, ensuring that Service Users are not at risk of abuse or coercion while under care.
- **Collaboration with National Authorities:** We will maintain ongoing collaboration with national organizations, including the GLAA, NCA, and the Independent Anti-Slavery Commissioner, to stay informed about emerging risks, share intelligence, and contribute to national efforts in eradicating modern slavery.
- **Stay Current on Legislative Changes:** The policy will be updated as necessary to comply with any changes to national or international regulations related to modern slavery and human trafficking.

4.2 Prevent Modern Slavery in Workforce and Recruitment

To prevent modern slavery from occurring in the workforce by establishing transparent recruitment, employment, and vetting practices, ensuring that all employees, contractors, and subcontractors are free from exploitation.

Actions:

- **Transparent Recruitment Processes:** All recruitment processes will be transparent and ethical, ensuring that candidates are fully informed about their rights, job responsibilities, and conditions of employment. We will verify that all candidates have the legal right to work in the UK and will conduct due diligence to prevent forced labour practices.
- **Thorough Background Checks:** Service 24 Support Limited will conduct rigorous vetting and background checks for all employees, contractors, and subcontractors. This includes criminal background checks, verification of employment history, and screening for any previous involvement in exploitative practices such as trafficking, forced labour, or human trafficking.
- **Zero-Tolerance Policy:** We will establish a zero-tolerance policy toward modern slavery, making it clear that any involvement in exploitative practices will result in immediate termination of employment or contract.
- **Prevention of Coercion or Exploitation:** We will implement practices to ensure that no employee is subjected to coercion, undue pressure, or exploitative working conditions,

including ensuring that all employees are paid fairly, provided with legal benefits, and offered safe working environments.

4.3 Safeguard Vulnerable Service Users from Exploitation

To protect Service 24 Support Limited' Service Users, especially those who are vulnerable, from modern slavery, human trafficking, and other forms of exploitation during the delivery of care.

Actions:

- **Staff Training on Identifying Exploitation:** All care staff will be trained to recognize signs of modern slavery or human trafficking among Service Users. This includes identifying physical signs of abuse, unusual dependency, fear, or coercion.
- **Clear Safeguarding Procedures:** We will establish clear safeguarding policies and procedures for identifying and reporting suspected modern slavery cases among Service Users. This will include referral protocols to the National Referral Mechanism (NRM) and specialized support agencies.
- **Empower Service Users:** We will foster a safe environment where Service Users feel comfortable reporting any concerns related to modern slavery. Service Users will be informed of their rights and given access to confidential support services.
- **Immediate Action for Suspected Cases:** Any suspicion of modern slavery will trigger immediate action, including referrals to appropriate support services, immediate safeguarding measures, and cooperation with law enforcement agencies if necessary.

4.4 Strengthen Transparency and Accountability in Supply Chains

To ensure transparency and accountability in Service 24 Support Limited' supply chains, ensuring that all suppliers, contractors, and third-party service providers comply with modern slavery prevention standards.

Actions:

- **Conduct Supplier Due Diligence:** We will conduct thorough due diligence on all new suppliers, contractors, and service providers before engagement, ensuring that they comply with the Modern Slavery Act 2015 and that they have policies and practices in place to prevent modern slavery.
- **Regular Supplier Audits:** We will audit suppliers regularly to ensure they continue to adhere to modern slavery prevention measures. Audits will assess both the supplier's internal practices and those within their own supply chain.
- **Ethical Sourcing:** Contracts with suppliers will include clear clauses that mandate compliance with the Modern Slavery Act 2015 and require suppliers to maintain ethical labour practices. These contracts will include provisions for **immediate termination** of agreements if a supplier is found to be involved in modern slavery.

4.5 Provide Staff Training and Raise Awareness

To equip all employees, contractors, and service providers with the knowledge, tools, and confidence to recognize, prevent, and report instances of modern slavery within the organization and the services provided.

Actions:

- **Comprehensive Training Programs:** We will develop and deliver mandatory training programs on modern slavery for all employees, contractors, and volunteers. The training will include:
 - The legal requirements of the Modern Slavery Act 2015.
 - Identification of signs of modern slavery and human trafficking.
 - Appropriate actions to take if modern slavery is suspected, including how to report concerns confidentially and safely.
- **Ongoing Education:** Regular refresher training will be provided to all staff members to ensure they remain up to date with the latest trends, legal changes, and best practices in combating modern slavery.
- **Promote a Culture of Vigilance:** We will foster a culture of awareness and vigilance within the organization, ensuring that staff feel supported and empowered to identify and act on suspicions of exploitation.

4.6 Provide Mechanisms for Reporting and Responding to Modern Slavery

To create safe, confidential, and effective systems for reporting suspected cases of modern slavery, ensuring that incidents are properly addressed and investigated in a timely manner.

Actions:

- **Confidential Reporting Channels:** Implement confidential and accessible reporting systems for all employees, contractors, Service Users, and third parties to raise concerns regarding modern slavery, without fear of retaliation.
- **Prompt Investigation of Reports:** All reports of suspected modern slavery will be investigated promptly and thoroughly, and appropriate action will be taken in accordance with the organization's procedures.
- **Support for Victims:** We will ensure that victims of modern slavery are supported throughout the process, including being referred to the National Referral Mechanism (NRM) and receiving access to necessary legal, medical, and psychological support.

4.7 Foster a Culture of Ethical Conduct and Zero Tolerance for Exploitation

To foster a culture of integrity, transparency, and accountability, ensuring that modern slavery is not tolerated within the organization.

Actions:

- **Integrate Anti-Slavery Principles into Organizational Values:** We will integrate modern slavery prevention into our core organizational values and policies, ensuring that all staff understand the importance of ethical conduct and the organization's commitment to eradicating modern slavery.
- **Promote Ethical Practices:** We will promote ethical business practices by engaging openly with employees, contractors, suppliers, and Service Users about the organization's commitment to preventing exploitation.

- **Leadership Engagement:** Senior leadership will set an example of accountability and ethical conduct, overseeing the implementation of this policy and ensuring that all staff are held to the highest standards of ethical behaviour.

4.8 Monitor and Review the Effectiveness of the Policy

To ensure continuous improvement in modern slavery prevention measures and keep the policy updated in line with emerging risks, legislation, and best practices.

Actions:

- **Monitor Compliance:** Regularly monitor the organization's compliance with this policy through audits, feedback from staff, and evaluation of reported incidents.
- **Annual Review of Policy:** We will review and update this policy on an annual basis, taking into account emerging risks, feedback from staff, changes in legislation, and any identified areas for improvement.
- **Report on Progress:** The organization will provide an annual report on the outcomes of modern slavery prevention measures, detailing actions taken, challenges faced, and improvements made.

4.9 Provide Support for Victims of Modern Slavery

To offer comprehensive and effective support to victims of modern slavery, ensuring that they are treated with dignity and respect and have access to the necessary services to recover.

Actions:

- **Referral Systems for Victims:** Establish clear referral pathways to the National Referral Mechanism (NRM) and other specialized services that support victims of modern slavery, including legal, medical, and psychological services.
- **Practical and Emotional Support:** Provide practical support such as access to safe housing, employment opportunities, and assistance in rebuilding their lives, as well as emotional support for recovery.
- **Confidentiality and Safety:** Ensure victims' confidentiality is respected at all stages of the support process, ensuring their safety and well-being are protected.

4.10 Continuous Improvement and Commitment to Best Practices

To ensure that Service 24 Support Limited remains at the forefront of efforts to combat modern slavery in the healthcare sector and beyond, continually improving our practices.

Actions:

- **Collaboration and Knowledge Sharing:** Actively collaborate with other healthcare providers, regulatory bodies, and anti-slavery organizations to stay informed about new best practices, emerging trends, and updated policies in modern slavery prevention.
- **Investment in Resources:** Invest in new technologies and resources that help identify, report, and respond to modern slavery, such as digital reporting systems, monitoring tools, and training programs.

- **Feedback and Evolution:** Maintain open dialogue with employees, contractors, and stakeholders to continuously improve the policy's effectiveness, ensuring that it evolves with changing landscapes and emerging risks.

5.0 LEGAL AND REGULATORY FRAMEWORK

The Legal and Regulatory Framework underpins this Modern Slavery Policy and Procedures for Service 24 Support Limited, ensuring compliance with national and international laws, standards, and regulations designed to combat modern slavery. This framework provides a structure that guides the development and implementation of this policy and ensures that Service 24 Support Limited meets its obligations to prevent, identify, and respond to modern slavery within its operations and supply chains.

The framework encompasses a range of laws and regulatory bodies that aim to safeguard individuals from modern slavery, promote transparency, and hold organizations accountable for their actions.

5.1 Modern Slavery Act 2015

To outline the legal requirements for businesses and organizations to prevent modern slavery, ensure transparency in supply chains, and disclose actions taken to address modern slavery.

Key Provisions:

- **Annual Modern Slavery Statement:** The Modern Slavery Act 2015 requires all organizations with a turnover of £36 million or more to publish an annual Modern Slavery Statement. This statement must outline the steps taken to prevent modern slavery in their operations and supply chains. For Service 24 Support Limited, this includes detailing policies, procedures, and actions taken to safeguard against exploitation.
- **Definition of Modern Slavery:** The Act defines modern slavery as including human trafficking, forced labour, and other forms of exploitation, such as servitude and domestic servitude. These forms of exploitation must be clearly recognized and combated in all operations.
- **Transparency in Supply Chains:** The Modern Slavery Act compels businesses to ensure supply chain transparency. This includes verifying that all products and services are sourced in a way that does not contribute to modern slavery or human trafficking. This also entails monitoring and auditing suppliers to ensure compliance with anti-slavery policies.
- **Penalties and Consequences:** Failure to comply with the Modern Slavery Act, including failure to publish a statement, can result in reputational damage, legal action, and the loss of business contracts.

5.2 Care Quality Commission (CQC) Regulations

To ensure that health and social care providers meet safeguarding standards that prevent abuse, including modern slavery, and provide safe, high-quality care.

Key Provisions:

- **Safeguarding Standards:** The CQC regulations require that healthcare providers ensure the safety and well-being of Service Users, protecting them from abuse, neglect, and

exploitation. Modern slavery is recognized as a serious safeguarding concern, and health providers must have clear policies to prevent, identify, and report incidents of exploitation.

- **Compliance with Safeguarding Policies:** As part of CQC’s fundamental standards, healthcare providers are required to have robust safeguarding policies in place. This includes ensuring that care workers are not subjected to exploitation, coercion, or trafficking within the workplace.
- **Staff Training:** Service 24 Support Limited must ensure that all staff are properly trained to recognize signs of abuse, including modern slavery, and know how to take immediate action when they suspect exploitation. This aligns with CQC’s emphasis on training and awareness within healthcare organizations.

5.3 Home Office and the National Crime Agency (NCA)

To support national leadership and law enforcement efforts in preventing and tackling modern slavery and human trafficking.

Key Provisions:

- **Home Office Leadership:** The Home Office provides strategic leadership in the fight against modern slavery. It coordinates the efforts of law enforcement, businesses, and other stakeholders, providing support and guidance on implementing the Modern Slavery Act 2015 and combating human trafficking.
- **National Crime Agency (NCA):** The NCA plays a crucial role in investigating and tackling organized crime, including human trafficking and modern slavery. The NCA provides intelligence and support to organizations like Service 24 Support Limited, enabling us to better identify and combat modern slavery within our operations and services.
- **Coordination of Resources:** The Home Office and NCA work together to support businesses in adopting best practices for modern slavery prevention and ensuring that those involved in modern slavery activities are prosecuted.

5.4 Gang-masters and Labour Abuse Authority (GLAA)

To protect vulnerable workers in high-risk industries and ensure that they are not subjected to modern slavery or exploitation.

Key Provisions:

- **Regulation of High-Risk Sectors:** The GLAA regulates industries with a higher risk of modern slavery, including agriculture, construction, and social care. Service 24 Support Limited, as a provider of social care, must ensure compliance with GLAA standards, especially in recruitment and labour practices, to prevent exploitation of workers.
- **Licensing and Auditing:** The GLAA is responsible for enforcing licensing requirements for labour providers and conducting regular audits in high-risk sectors to ensure that workers are not subject to exploitative practices, including modern slavery.
- **Intervention and Enforcement:** The GLAA intervenes when exploitation is identified, providing support and enforcement action. Service 24 Support Limited is required to report any identified instances of labour exploitation to the GLAA for further investigation.

5.5 Anti-Slavery International

To guide businesses in understanding the full scope of modern slavery and provide advice on best practices for its eradication.

Key Provisions:

- **Global Advocacy and Guidance:** Anti-Slavery International is a leading human rights organization that works to raise awareness and combat modern slavery worldwide. It provides research, policy guidance, and tools for businesses to better understand modern slavery and take practical steps to eliminate it from their operations.
- **Business Support:** Through Anti-Slavery International, Service 24 Support Limited receives ongoing guidance on policies and procedures that reflect best practices for modern slavery prevention, ensuring that our approaches remain effective and compliant with global standards.

5.6 Independent Anti-Slavery Commissioner

To oversee and promote best practices in the fight against modern slavery, ensuring businesses adhere to the Modern Slavery Act 2015 and contribute to the national effort to combat human trafficking.

Key Provisions:

- **Monitoring and Reporting:** The Independent Anti-Slavery Commissioner monitors the efforts of businesses, government agencies, and other organizations in preventing modern slavery. This includes conducting audits and assessments of businesses' compliance with the Modern Slavery Act and encouraging organizations like Service 24 Support Limited to adopt best practices.
- **Collaboration and Advocacy:** The Commissioner advocates for stronger laws, enhanced enforcement, and greater collaboration across sectors to combat modern slavery. Service 24 Support Limited will collaborate with the Independent Anti-Slavery Commissioner to share insights, progress, and challenges in tackling modern slavery.

5.7 Human Trafficking Foundation

To prevent human trafficking, provide support for victims, and advocate for stronger enforcement practices.

Key Provisions:

- **Support for Victims:** The Human Trafficking Foundation provides crucial support services for victims of trafficking and modern slavery. It advocates for victim-centred approaches and ensures that victims receive the necessary medical, psychological, and legal support.
- **Policy Advocacy:** The Foundation pushes for stronger laws and more effective enforcement of anti-trafficking measures. It works with businesses, including Service 24 Support Limited, to ensure that trafficking and modern slavery are systematically addressed and that survivors are treated with dignity and respect.

5.8 Equality and Human Rights Commission (EHRC)

To ensure compliance with human rights law and protect individuals from exploitation, including modern slavery.

Key Provisions:

- **Monitoring Human Rights Compliance:** The EHRC monitors businesses for compliance with human rights law, ensuring that all practices respect the rights and dignity of individuals. The EHRC enforces compliance with human rights standards, particularly in relation to modern slavery and exploitation.
- **Legal Support and Enforcement:** The EHRC can take legal action against organizations found to be in violation of human rights, including failure to prevent modern slavery. Service 24 Support Limited will work closely with the EHRC to ensure that human rights and anti-slavery standards are upheld across all operations.

5.9 UK Border Force

To prevent trafficking and modern slavery at the UK border and support the investigation of modern slavery offenses.

Key Provisions:

- **Border Control and Prevention:** The UK Border Force plays a vital role in preventing human trafficking and modern slavery at the UK border by conducting immigration controls and ensuring that individuals entering the UK are not trafficked for exploitation.
- **Support for Investigations:** The UK Border Force works with businesses and law enforcement agencies to investigate and prosecute modern slavery offenses. Service 24 Support Limited will cooperate with the UK Border Force in cases where modern slavery is suspected.

5.10 Police Forces and Crown Prosecution Service (CPS)

To investigate modern slavery offenses and prosecute perpetrators of human trafficking and forced labour.

Key Provisions:

- **Investigation of Offenses:** Local police forces are responsible for investigating modern slavery offenses, including those involving human trafficking, forced labour, and sexual exploitation. Service 24 Support Limited will assist law enforcement agencies by reporting suspected cases and providing support during investigations.
- **Prosecution of Offenders:** The Crown Prosecution Service (CPS) is responsible for prosecuting offenders of modern slavery. The CPS works closely with law enforcement to build strong cases against traffickers and employers involved in exploitation.

5.11 National Referral Mechanism (NRM)

To identify and support victims of human trafficking and modern slavery through a structured referral process.

Key Provisions:

- **Referral of Victims:** Service 24 Support Limited is required to use the National Referral Mechanism (NRM) to refer individuals identified as potential victims of modern slavery. The NRM ensures that victims are provided with the necessary support and that their cases are investigated properly.

- **Cooperation with Support Agencies:** Through the NRM, Service 24 Support Limited will refer victims to specialist support services, such as legal aid, safe housing, and recovery services, ensuring victims receive holistic care.

5.12 Department for Education (DfE)

To ensure the protection of children from modern slavery and exploitation, particularly in educational and care settings.

Key Provisions:

- **Child Protection:** The DfE works with schools, care providers, and local authorities to ensure that children are protected from modern slavery. This includes ensuring safeguarding practices are in place in all settings where children are at risk of exploitation.
- **Education and Training:** The DfE provides guidance to educational providers and care services on identifying children at risk of exploitation and modern slavery.

5.13 National Health Service (NHS)

To provide healthcare and support for victims of modern slavery, ensuring that medical and psychological needs are met.

Key Provisions:

- **Medical Assistance for Victims:** The NHS provides critical medical and psychological support to victims of modern slavery. Health professionals are trained to identify the signs of exploitation and take the necessary steps to ensure victims receive the care they need.
- **Training for Health Professionals:** The NHS ensures that healthcare workers are educated to recognize modern slavery and respond appropriately, including providing victims with information about their rights and available support services.

6.0 ROLES AND RESPONSIBILITIES

The Modern Slavery Policy and Procedures for Service 24 Support Limited outlines specific roles and responsibilities across the organization to ensure effective implementation, compliance, and continuous monitoring of anti-slavery measures. These roles are designed to align with CQC regulations and national UK institutions focused on the prevention of modern slavery, such as the Gangmasters and Labour Abuse Authority (GLAA), National Crime Agency (NCA), and Home Office. Each individual within the organization has a role in preventing, identifying, and responding to modern slavery, from leadership to frontline staff.

6.1 Senior Leadership and Board of Directors

Ensure strategic oversight, accountability, and commitment to preventing modern slavery within the organization.

Responsibilities:

- **Establish Commitment:** Senior leadership is responsible for demonstrating a strong commitment to eradicating modern slavery and human trafficking in all aspects of Service 24 Support Limited's operations, including service delivery, supply chain, and recruitment.

- **Policy Approval:** Review and approve the Modern Slavery Policy and Procedures to ensure it aligns with organizational values, regulatory requirements, and industry best practices.
- **Resource Allocation:** Ensure adequate resources, including financial and human capital, are allocated for the effective implementation and enforcement of the modern slavery policy.
- **Annual Review and Reporting:** Ensure the annual Modern Slavery Statement is published in accordance with the Modern Slavery Act 2015, detailing actions taken, outcomes, and improvements.
- **Monitor Effectiveness:** Oversee the organization's approach to modern slavery, including reviewing audits, reports, and feedback on the policy's effectiveness.
- **Ensure Compliance:** Ensure that Service 24 Support Limited complies with CQC regulations, particularly safeguarding standards that address modern slavery and the quality of care for vulnerable individuals.

6.2 Modern Slavery Officer

Provide operational leadership in the implementation, monitoring, and review of the Modern Slavery Policy and Procedures.

Responsibilities:

- **Policy Implementation:** Lead the operational rollout and implementation of the Modern Slavery Policy across all levels of the organization, ensuring it is integrated into day-to-day practices.
- **Monitoring Compliance:** Continuously monitor compliance with the policy and CQC regulations, and assess the effectiveness of anti-slavery measures.
- **Reporting and Documentation:** Oversee the documentation of incidents, investigations, and corrective actions related to modern slavery, ensuring compliance with reporting and record-keeping standards.
- **Staff Training and Awareness:** Coordinate training programs for staff at all levels to ensure they understand modern slavery risks, signs of exploitation, and how to respond appropriately.
- **Support Victims:** Ensure that victims of modern slavery are provided with appropriate support, including access to legal, medical, and psychological services, as outlined in the policy.
- **Liaison with Authorities:** Act as the main point of contact for collaboration with external authorities, such as the National Crime Agency (NCA), Gangmasters and Labour Abuse Authority (GLAA), and other relevant bodies.
- **Continuous Improvement:** Regularly review and update the policy, based on emerging risks, legislative changes, and feedback from staff and external audits.

6.3 Registered Manager

Ensure the day-to-day management and oversight of the care setting, ensuring that modern slavery is actively prevented, identified, and addressed at the operational level.

Responsibilities:

- **Implement Safeguarding Procedures:** The Registered Manager is responsible for ensuring that all safeguarding policies are implemented and adhered to, including modern slavery prevention protocols. They will ensure that all staff understand and follow safeguarding procedures.
- **Staff Training and Development:** Ensure that all care staff, including new hires and ongoing employees, receive regular training on modern slavery awareness and safeguarding practices. This includes recognizing signs of modern slavery in Service Users and staff.
- **Monitor Care Practices:** Regularly monitor care practices to ensure that Service Users are not subjected to exploitation or modern slavery. This includes making sure that care environments are free from coercion and abuse.
- **Identify and Report Suspicious Activity:** Act as the first point of contact for identifying and addressing any suspicious activity or concerns regarding modern slavery. The Registered Manager should report any suspected cases to the Modern Slavery Officer and collaborate with law enforcement and regulatory bodies when necessary.
- **Support Victims:** If modern slavery is suspected, the Registered Manager ensures that the affected individuals are referred to the National Referral Mechanism (NRM) and provided with immediate access to appropriate services such as legal, medical, and psychological support.
- **Regular Audits and Reviews:** Conduct regular internal audits to assess compliance with the Modern Slavery Policy, ensuring all care procedures meet safeguarding and modern slavery prevention standards.

6.4 Nominated Individual

Ensure that the organization's overall strategic approach to modern slavery is properly implemented, coordinated, and aligned with legal and regulatory requirements, while maintaining overall responsibility for compliance and reporting.

Responsibilities:

- **Strategic Oversight:** The Nominated Individual holds ultimate responsibility for the organization's compliance with the Modern Slavery Act 2015, ensuring that the Modern Slavery Policy is effectively implemented across all levels.
- **Ensure Resource Allocation:** The Nominated Individual is responsible for ensuring the allocation of necessary resources, both financial and human, to combat modern slavery within the organization, including staffing and training.
- **Maintain Organizational Accountability:** Provide the Board of Directors with updates on the effectiveness of the modern slavery policy and any challenges faced in the implementation and adherence to anti-slavery practices. Ensure that modern slavery is on the organizational agenda and is continually prioritized.
- **Promote Culture of Ethical Practice:** Encourage a culture of transparency and accountability, ensuring that modern slavery prevention is at the core of the organization's

values and that all staff understand their role in identifying, reporting, and responding to modern slavery.

- **Lead by Example:** As a senior figure, the Nominated Individual sets the tone for the rest of the organization by demonstrating an ethical commitment to eradicating modern slavery. They are involved in strategic decision-making processes related to anti-slavery practices.
- **Annual Reporting:** Ensure that the Modern Slavery Statement is published annually in compliance with legal requirements, and ensure the organization remains transparent regarding its efforts to prevent and address modern slavery.

6.5 Safeguarding Lead

Ensure that safeguarding policies related to modern slavery are implemented effectively, protecting Service Users from exploitation.

Responsibilities:

- **Safeguarding Policies:** Develop, implement, and review safeguarding policies specifically addressing modern slavery, human trafficking, and exploitation in care settings. These policies should be regularly updated in line with best practices and legislation.
- **Recognize and Respond to Exploitation:** Ensure that care staff are trained to identify signs of exploitation, including modern slavery, and respond appropriately. This may involve identifying vulnerable individuals who may be at greater risk of being exploited.
- **Report and Act on Incidents:** Ensure that any suspected cases of modern slavery are immediately reported and acted upon, with Service Users being referred to the National Referral Mechanism (NRM) for appropriate intervention.
- **Support for Victims:** Provide victims of modern slavery with immediate protection and ensure they are given access to the necessary support services to recover.

6.6 Human Resources (HR) Department

Ensure ethical recruitment, vetting, and employment practices, protecting staff from exploitation and modern slavery.

Responsibilities:

- **Transparent Recruitment:** Implement and maintain transparent recruitment processes that prevent coercion or exploitation. Ensure that candidates are fully informed of their rights and that eligibility to work in the UK is verified.
- **Vetting and Screening:** Conduct comprehensive background checks for all employees, including criminal record checks, verification of employment history, and screening for previous involvement in exploitative practices such as human trafficking or forced labour.
- **Support for Employees:** Support employees who are at risk of exploitation or report concerns of modern slavery. Ensure that HR staff are trained in recognizing signs of modern slavery and provide clear procedures for reporting any suspicions.
- **Fair Working Conditions:** Monitor working conditions to ensure that all employees are treated fairly and protected from exploitation. This includes ensuring that employees have the right to freely choose and leave employment, and that they are paid fairly and work in safe environments.

6.7 Line Managers and Supervisors

Ensure effective day-to-day management, monitoring, and support of employees, and foster an environment free from modern slavery and exploitation.

Responsibilities:

- **Awareness of Modern Slavery:** Ensure that employees under their supervision are aware of modern slavery risks and know how to report any concerns.
- **Monitor Working Conditions:** Regularly assess working conditions to ensure that employees are not subjected to modern slavery or exploitation. This includes monitoring for signs of coercion, abuse, or undue pressure on employees or Service Users.
- **Immediate Action on Concerns:** Take immediate action when modern slavery is suspected, including reporting concerns to the Modern Slavery Officer and working with law enforcement to address any identified issues.
- **Promote a Safe Reporting Environment:** Create a culture where staff feel comfortable raising concerns about modern slavery without fear of retaliation.

6.8 External Partners and Contractors

Ensure that all third-party service providers, contractors, and suppliers comply with anti-slavery practices and contribute to the eradication of modern slavery.

Responsibilities:

- **Supplier Compliance:** Ensure that third-party providers, contractors, and suppliers comply with Service 24 Support Limited' Modern Slavery Policy and Modern Slavery Act 2015 requirements.
- **Audit and Monitoring:** Participate in regular audits of third-party contractors to verify that their labour practices meet ethical standards and that modern slavery does not exist within their operations or supply chains.
- **Transparent Reporting:** Ensure that any suspected violations of the policy or modern slavery laws are immediately reported to the Modern Slavery Officer.

7.0 RISK ASSESSMENT AND MANAGEMENT

A comprehensive Risk Assessment and Management Framework is a critical element of the Modern Slavery Policy and Procedures for Service 24 Support Limited. This framework ensures that the organization proactively identifies, assesses, and mitigates risks related to modern slavery within its workforce, service delivery, and supply chains. The goal is to protect vulnerable individuals from exploitation, comply with CQC regulations, and meet the standards set by national UK institutions such as the Modern Slavery Act 2015, the Gangmasters and Labour Abuse Authority (GLAA), and the National Crime Agency (NCA).

The Risk Assessment and Management Framework will be designed to ensure that all potential risks are effectively managed and mitigated, minimizing the possibility of modern slavery occurring within Service 24 Support Limited' operations and associated services.

7.1 Risk Identification

To systematically identify and assess all potential risks related to modern slavery in the operations and service delivery of Service 24 Support Limited.

Actions:

- Conduct Comprehensive Risk Assessments:
 - Regularly assess internal operations and external factors to identify any potential risk of modern slavery. This includes evaluating areas such as:
 - Recruitment practices.
 - Employment conditions for care staff, contractors, and Service Users.
 - The supply chain, especially in sectors that are vulnerable to exploitation (e.g., cleaning, security, temporary staffing).
 - High-risk service delivery areas, such as domiciliary care, where Service Users may be at higher risk of coercion and exploitation.
- Evaluate Vulnerabilities in Service Users:
 - Identify specific groups within the Service User population who are more likely to be vulnerable to modern slavery, such as individuals with learning disabilities, mental health conditions, and those with language barriers or social isolation.
- Analyse External Threats:
 - Assess risks originating from external environments such as external partners, contractors, and suppliers to ensure modern slavery risks are mitigated before engaging with them.
- Consultation with External Experts:
 - Collaborate with external bodies such as the National Crime Agency (NCA), Gangmasters and Labour Abuse Authority (GLAA), and Anti-Slavery International to ensure that risk assessments are comprehensive and reflect best practices in modern slavery prevention.

7.2 Risk Assessment Methodology

To use a structured approach to assess the level of risk associated with modern slavery within different areas of Service 24 Support Limited' operations.

Actions:

- Risk Scoring System:
 - Implement a risk scoring system to quantify and prioritize identified risks. Each identified risk will be assigned a risk score based on the likelihood of occurrence and potential impact. For example:
 - High risk: High likelihood of modern slavery, significant impact on vulnerable individuals, and potential legal or reputational consequences.

- Medium risk: Moderate likelihood, moderate impact, and potential consequences that could be mitigated with interventions.
- Low risk: Low likelihood of modern slavery occurring, with minimal impact or immediate intervention required.
- Cross-Departmental Risk Assessment:
 - The risk assessment process should involve input from multiple departments across the organization, including Human Resources (HR), Safeguarding, Procurement, Operations, and Compliance to ensure all aspects of modern slavery are considered.
- Continuous Risk Monitoring:
 - Continuous monitoring of operational changes, new legislation, and shifts in the labour market will be incorporated into the risk management process to ensure the organization remains vigilant and responsive to new or emerging risks related to modern slavery.

7.3 Risk Mitigation and Management

To implement targeted actions that address and mitigate identified risks related to modern slavery within Service 24 Support Limited.

Actions:

- Implement Preventative Measures:
 - Recruitment and Employment:
 - Ensure transparent recruitment practices that protect against exploitation, including identity verification, right to work checks, and background checks for all employees and contractors.
 - Develop fair working conditions that prevent coercion, including fair wages, contractual agreements, and safe working hours.
 - Training and Awareness:
 - Ensure that all employees and contractors receive modern slavery awareness training as part of their induction and ongoing professional development.
 - Offer specific safeguarding training for staff working with vulnerable Service Users, including recognizing the signs of modern slavery and understanding the procedures for reporting suspicions.
 - Supply Chain Management:
 - Conduct regular supplier audits and due diligence checks to assess the labour conditions in the supply chain, ensuring that all suppliers adhere to ethical labour practices and comply with the Modern Slavery Act 2015.
 - Include modern slavery clauses in all supplier contracts, ensuring compliance and offering the right to terminate contracts if slavery or trafficking is identified in the supply chain.

- Service Delivery:
 - Implement safeguarding protocols specifically targeting vulnerable individuals, particularly in domiciliary care or residential settings, where Service Users may be more susceptible to modern slavery.
 - Empower Service Users by providing them with information on how to report abuse or exploitation, offering them access to confidential and supportive reporting channels.
- Incident Response and Victim Support:
 - Establish clear reporting and referral mechanisms for staff to report suspected modern slavery. Ensure that victims of modern slavery are immediately referred to the National Referral Mechanism (NRM) and appropriate support services.
 - Provide immediate support to victims, including access to medical care, legal advice, and safe housing.

7.4 Roles and Responsibilities in Risk Management

To clarify the roles and responsibilities of key individuals and departments within Service 24 Support Limited in managing risks related to modern slavery.

Actions:

- Senior Leadership: Ensure strategic oversight and resource allocation for modern slavery risk management and prevention, including monitoring risk assessments and mitigation efforts.
- Registered Manager: Oversee the implementation of safeguarding measures, conduct staff training on modern slavery, and manage incidents of suspected exploitation within care settings.
- Modern Slavery Officer: Lead the coordination of risk assessments, ensure effective reporting mechanisms are in place, and ensure victims of modern slavery receive the necessary support. Ensure that due diligence is conducted on suppliers and contractors.
- Human Resources: Ensure all recruitment practices and employment conditions are transparent and free from exploitation. Conduct background checks and ensure fair working conditions for all employees.
- Procurement: Conduct supplier risk assessments, monitor the labour practices of third-party contractors and suppliers, and ensure that modern slavery prevention clauses are embedded in contracts.
- Care Staff: Be vigilant in identifying signs of modern slavery among Service Users and report suspicions through the appropriate channels. Ensure that safeguarding procedures are followed when modern slavery is suspected.
- Compliance: Ensure regular audits of compliance with the Modern Slavery Act 2015 and CQC regulations, including monitoring the effectiveness of modern slavery prevention measures.

7.5 Risk Monitoring and Review

To ensure the ongoing effectiveness of modern slavery prevention efforts and to continuously monitor and review the risk management process.

Actions:

- Regular Risk Reviews:
 - Conduct annual reviews of the risk assessment framework to ensure its continued effectiveness, incorporating feedback from employees, stakeholders, and external audits.
 - Review new and emerging risks on a regular basis, adjusting risk management strategies as necessary to address changes in legislation, operational practices, or the external environment.
- Audits and Inspections:
 - Conduct internal audits on modern slavery risks and compliance with the Modern Slavery Act. These audits should include reviewing policies, recruitment practices, supply chain management, and safeguarding procedures.
 - Use external inspections or audits to provide an additional layer of oversight and to ensure that Service 24 Support Limited is meeting its legal obligations and best practices.
- Feedback Mechanisms:
 - Engage with employees, Service Users, and external partners to gather feedback on the effectiveness of the modern slavery prevention measures and make improvements based on this input.

7.6 Reporting and Documentation

Objective: To ensure that all incidents, actions, and outcomes related to modern slavery are properly documented and reported.

Actions:

- Incident Documentation: Ensure that all incidents or concerns related to modern slavery are documented accurately, including the identification, reporting, investigation, and resolution of the incident.
- Annual Modern Slavery Report: Publish an annual Modern Slavery Statement in accordance with the Modern Slavery Act 2015, providing transparency on actions taken, lessons learned, and improvements made.

8.0 PREVENTIVE MEASURES AND CONTROLS

The Preventive Measures and Controls within the Modern Slavery Policy and Procedures for Service 24 Support Limited are designed to proactively identify, prevent, and mitigate the risk of modern slavery within the organization's operations, supply chains, and service delivery. These measures are aligned with CQC regulations, the Modern Slavery Act 2015, and other relevant UK

institutions, including the National Crime Agency (NCA), the Gangmasters and Labour Abuse Authority (GLAA), and Anti-Slavery International.

The goal of these preventive measures is to create a safe environment for employees, contractors, Service Users, and partners, ensuring that modern slavery is eradicated and that Service 24 Support Limited remains compliant with national and international standards.

8.1 Transparent Recruitment and Employment Practices

To ensure that recruitment and employment practices are free from coercion, exploitation, and modern slavery, promoting fair and ethical treatment of all staff and contractors.

Preventive Measures and Controls:

- Clear Recruitment Processes:
 - All job advertisements, interviews, and hiring processes will be transparent, ensuring that candidates understand their rights, job responsibilities, remuneration, and working conditions.
 - Eligibility to Work Checks: We will verify the right to work in the UK for all candidates, ensuring that there is no exploitation or forced labour involved in the recruitment process.
- Vetting and Background Checks:
 - Conduct thorough background checks on all employees, contractors, and subcontractors, including:
 - Criminal background checks to ensure candidates have no links to human trafficking, forced labour, or other exploitative practices.
 - Work history verification to confirm past employment and ensure there are no associations with organizations or individuals involved in modern slavery.
 - References from previous employers to ensure transparency and adherence to ethical employment standards.
- Fair Employment Contracts:
 - Provide clear, fair employment contracts for all employees, including full-time, part-time, temporary, and contract workers, outlining working hours, pay, and terms and conditions, to ensure there is no ambiguity or exploitation.
 - Ensure all employees are aware of their legal rights and that they are given the freedom to leave employment without coercion.
- Employee Support and Protection:
 - Ensure that all employees are aware of their rights, the reporting procedures for modern slavery concerns, and the whistleblowing mechanism to report any signs of exploitation.
 - Maintain a zero-tolerance policy toward modern slavery, ensuring that all employees are educated about and committed to preventing exploitation.

8.2 Safeguarding and Protection for Service Users

To ensure that vulnerable Service Users are protected from modern slavery, trafficking, and any form of abuse or exploitation while receiving care.

Preventive Measures and Controls:

- Comprehensive Safeguarding Policies:
 - Develop and implement safeguarding policies specifically addressing the risks of modern slavery, trafficking, and exploitation within care settings. These policies should align with CQC safeguarding standards and include provisions for identifying and responding to modern slavery cases.
- Staff Training on Exploitation Risks:
 - Regular training for all care staff to help them recognize signs of modern slavery, particularly in vulnerable Service Users such as those with learning disabilities, mental health issues, or those at risk of social isolation.
 - Training should cover indicators such as fearfulness, restricted freedom of movement, poor living conditions, and dependency on others.
- Safeguarding Protocols and Reporting Procedures:
 - Establish clear safeguarding protocols to ensure that any suspected case of modern slavery is immediately reported and investigated.
 - Ensure that suspected victims are referred to the National Referral Mechanism (NRM) for further support and intervention. Victims will be provided with medical, psychological, legal, and housing support, as appropriate.
- Service User Empowerment:
 - Inform Service Users about their rights and how to report any suspicions of exploitation or modern slavery.
 - Encourage open communication and create a safe environment where Service Users feel comfortable reporting concerns without fear of retaliation.

8.3 Supply Chain Due Diligence

To ensure transparency and prevent modern slavery risks within the supply chain by working with ethical suppliers and service providers.

Preventive Measures and Controls:

- Supplier Risk Assessments:
 - Conduct regular risk assessments on suppliers and contractors to ensure compliance with anti-slavery measures. This includes assessing suppliers' policies, labour practices, and any history of non-compliance with the Modern Slavery Act 2015.
 - Review the geographical locations of suppliers, particularly in regions or sectors with known high risks of exploitation, such as agriculture, construction, and temporary labour.
- Supplier Audits and Monitoring:

- Perform regular audits of suppliers, including both announced and unannounced visits, to verify that their practices align with modern slavery prevention requirements.
- Review labour practices throughout the supply chain to ensure that no subcontractors or suppliers engage in modern slavery or exploitation.
- Ethical Procurement Practices:
 - Implement ethical procurement practices by selecting suppliers and contractors who demonstrate a commitment to preventing modern slavery and human trafficking. Suppliers will be required to sign contracts that include clauses mandating compliance with anti-slavery laws.
 - Ensure that contracts with suppliers include provisions for immediate contract termination if any supplier is found to be involved in modern slavery or forced labour practices.
- Supplier Engagement:
 - Work closely with suppliers to ensure they understand the importance of transparency in their labour practices and encourage them to adopt anti-slavery policies within their own supply chains.

8.4 Comprehensive Staff Training and Awareness

To equip all staff with the knowledge and skills necessary to prevent modern slavery and respond appropriately to potential cases.

Preventive Measures and Controls:

- Mandatory Modern Slavery Awareness Training:
 - Provide mandatory training for all employees and volunteers to recognize the signs of modern slavery, human trafficking, and forced labour. This training will be incorporated into the onboarding process and repeated periodically.
 - Training should cover topics such as:
 - Definition of modern slavery (human trafficking, forced labour, servitude).
 - Identification of exploitation signs (physical signs, psychological manipulation, restricted movement).
 - Whistleblowing procedures for reporting suspected modern slavery.
- Ongoing Education and Updates:
 - Ensure regular refresher training sessions for employees to keep them informed about the latest trends, legal developments, and best practices in combating modern slavery.
 - Maintain a culture of continuous improvement by engaging staff in discussions on emerging risks, new policies, and sharing real-life case studies.
- Role-Specific Training:

- Tailor training to specific roles within the organization, such as care staff, HR professionals, and procurement teams, to address the unique risks each group faces related to modern slavery.

8.5 Confidential Reporting Mechanisms and Support Systems

To provide safe and confidential mechanisms for reporting modern slavery and to offer support to potential victims of exploitation.

Preventive Measures and Controls:

- Confidential Reporting Channels:
 - Implement confidential reporting mechanisms that allow employees, Service Users, and external partners to report suspicions of modern slavery without fear of retaliation. These mechanisms should include:
 - Hotlines for anonymous reporting.
 - Online reporting systems for easy access to confidential submissions.
 - Designated staff members for reporting concerns and ensuring that all incidents are promptly addressed.
- Whistleblowing Policy:
 - Establish a whistleblowing policy that encourages staff to report unethical practices, including modern slavery, without fear of reprisal.
 - Ensure that all reports of modern slavery are thoroughly investigated and documented in compliance with legal requirements.
- Support for Victims of Modern Slavery:
 - Provide immediate support services to victims, including legal advice, safe accommodation, and access to medical and psychological care.
 - Collaborate with external agencies, such as the National Referral Mechanism (NRM), to ensure victims are supported in their recovery and have access to long-term assistance.

8.6 Monitoring, Auditing, and Evaluation

To ensure ongoing monitoring and evaluation of modern slavery risks and ensure that preventive measures remain effective and relevant.

Preventive Measures and Controls:

- Internal Audits:
 - Conduct regular internal audits of all areas related to modern slavery, including recruitment practices, care service delivery, and supply chain management. Audits will evaluate the effectiveness of the policy and identify any gaps or areas for improvement.
- External Audits:

- Engage third-party auditors to perform independent assessments of modern slavery risks across the organization. This external validation ensures objectivity and provides a fresh perspective on potential issues.
- Continuous Feedback:
 - Establish a feedback mechanism where employees, Service Users, and external partners can share their views on the effectiveness of the Modern Slavery Policy. This feedback will help improve preventive measures and risk management strategies.
- Annual Review and Reporting:
 - Conduct an annual review of the policy's effectiveness, ensuring that all measures align with current best practices, regulations, and emerging trends. The organization will publish an annual report on the progress made in combating modern slavery, detailing the effectiveness of preventive actions taken.

9.0 PROCEDURES FOR IDENTIFYING AND RESPONDING TO MODERN SLAVERY

The Procedures for Identifying and Responding to Modern Slavery within the Modern Slavery Policy and Procedures for Service 24 Support Limited are critical to ensure that any signs of modern slavery, human trafficking, or exploitation are identified promptly and appropriately responded to. These procedures are designed to protect vulnerable individuals, comply with CQC regulations, and align with the Modern Slavery Act 2015, as well as guidance from other national UK institutions such as the National Crime Agency (NCA), Gangmasters and Labour Abuse Authority (GLAA), and the Independent Anti-Slavery Commissioner.

These procedures will ensure a systematic, coordinated, and victim-centred approach, focusing on early identification, clear action steps, and providing support to victims while maintaining strict confidentiality.

9.1 Identification of Modern Slavery

Objective: To ensure that all staff members are capable of identifying potential cases of modern slavery and exploitation within Service 24 Support Limited' services and operations.

Actions:

- Staff Awareness and Training:
 - Mandatory training for all employees, contractors, and volunteers, covering the key indicators of modern slavery (such as forced labour, human trafficking, domestic servitude, etc.), and how to respond.
 - Specific indicators to watch for:
 - Fearful or anxious behaviour from individuals.
 - Signs of physical or psychological abuse, such as malnourishment, injuries, or a lack of basic personal hygiene.

- Restricted freedom of movement, such as individuals who are unable to speak freely, are always accompanied by another person, or are not allowed to leave the premises.
 - Dependence on another person, particularly if they appear to be financially controlled or under the influence of another individual.
 - Lack of identification or documents: Service Users or employees without identification documents or a clear narrative of their life situation.
 - Unusual living conditions: Living conditions that are substandard or segregated from others in care settings, such as overcrowded or unsafe living environments.
- Observation and Vigilance:
 - All staff are encouraged to be vigilant and actively look for warning signs of modern slavery within both Service Users and employees.
 - Regular supervision and check-ins with vulnerable Service Users and staff to build rapport and help identify any emerging signs of exploitation.
 - Indicators in Supply Chains:
 - For those involved in procurement or managing external contractors, due diligence checks will be conducted regularly to ensure there are no indicators of forced or exploitative labour within the supply chain.
 - Contractor audits will be conducted, particularly in high-risk areas such as temporary staffing, cleaning, or security services.

9.2 Responding to Suspected Modern Slavery Cases

Objective: To outline the clear steps and procedures for responding to suspicions or confirmed cases of modern slavery, ensuring immediate protection for victims and compliance with the law.

Actions:

- Immediate Protection of Victims:
 - Ensure the safety of potential victims by moving them to a safe location away from the abuser or exploiter.
 - If the victim is a Service User, ensure they are immediately referred to the appropriate support services, such as legal aid, medical care, and psychological support.
 - Ensure confidentiality: All actions taken will be in line with confidentiality agreements, ensuring that the victim's identity and personal details are protected throughout the process.
- Reporting to the Modern Slavery Officer:
 - Any suspected cases of modern slavery must be immediately reported to the Modern Slavery Officer. They are responsible for coordinating further investigations and ensuring that the National Referral Mechanism (NRM) is used if necessary.

- Log incidents: Document and log all suspected cases of modern slavery to ensure that they are handled properly, that the case is tracked, and that actions are taken in compliance with legal and organizational requirements.
- Referral to the National Referral Mechanism (NRM):
 - Service 24 Support Limited will refer any suspected victims of modern slavery to the National Referral Mechanism (NRM). This is a UK-wide framework for identifying and supporting victims of modern slavery, which allows authorities to assess the case and provide specialized support.
 - Ensure that referral forms are completed and submitted promptly to ensure the victim receives the necessary support from law enforcement, NGOs, and other services.
- Engage Law Enforcement:
 - If modern slavery is suspected, law enforcement should be notified immediately. Service 24 Support Limited will cooperate fully with police forces, the National Crime Agency (NCA), Gangmasters and Labour Abuse Authority (GLAA), or other relevant authorities to facilitate investigations.
 - In cases where there is a high risk of harm, or where a crime is being actively committed, the police should be contacted immediately, and an investigation will be conducted to identify the perpetrators.
- Handling Concerns Raised by Employees:
 - If a staff member raises concerns about their own working conditions or any potential exploitative practices, they will be provided with confidential channels to report these concerns (e.g., whistleblowing procedures).
 - HR will ensure that any concerns raised by staff are investigated without fear of retaliation, providing support to staff who may be vulnerable to exploitation.

9.3 Investigating and Taking Corrective Actions

To ensure thorough investigations into suspected modern slavery cases and take appropriate actions to address and resolve any issues found.

Actions:

- Immediate Investigation:
 - The Modern Slavery Officer will lead a timely investigation into all reports of suspected modern slavery, ensuring that the investigation is conducted with the utmost care and sensitivity.
 - All relevant facts will be gathered, including interviews with affected individuals, witness statements, and review of documentation to understand the full scope of the issue.
- Cooperate with External Authorities:
 - Work closely with local law enforcement and specialized anti-slavery organizations (e.g., Anti-Slavery International, Human Trafficking Foundation) during

investigations to ensure victims' rights are protected and that perpetrators are held accountable.

- **Corrective and Remedial Actions:**
 - If modern slavery is confirmed, Service 24 Support Limited will take corrective actions, such as:
 - Revising policies and procedures to close any gaps that allowed exploitation to occur.
 - Providing restorative care and support for victims to facilitate recovery and integration into society.
 - Terminating contracts with suppliers or contractors found to be involved in modern slavery, and seeking alternative suppliers who meet ethical standards.
 - Disciplinary actions against employees found to be complicit or involved in modern slavery practices.
- **Root Cause Analysis:**
 - Conduct a root cause analysis to determine the underlying reasons why modern slavery was able to occur within the organization. This will help identify areas where internal processes or safeguarding measures need to be improved.

9.4 Victim Support and Referral Pathways

To ensure that victims of modern slavery receive comprehensive support, both during and after the investigation, in line with victim-centred approaches.

Actions:

- **Victim-Centred Approach:**
 - Ensure that all victim support actions are taken with the victim's safety and dignity as the top priority. Support should empower victims to regain control over their lives and to recover from exploitation in a safe and secure environment.
- **Comprehensive Support Services:**
 - Provide immediate access to a wide range of services, including:
 - Legal assistance to ensure victims understand their rights and can navigate the legal system.
 - Medical care to address any physical injuries or health conditions resulting from exploitation.
 - Psychological support to help victims process trauma and rebuild their emotional well-being.
 - Accommodation where victims can be relocated to a safe environment, away from potential harm.
- **Ensure Access to Long-Term Care:**

- Once an individual is referred to the National Referral Mechanism (NRM), ensure that they continue to receive long-term support until they are fully recovered and able to live independently.
- Collaborate with Partner Agencies:
 - Service 24 Support Limited will collaborate with relevant partners, such as local authorities, NGOs, and law enforcement, to provide a coordinated response to victims' needs.

9.5 Continuous Monitoring and Review

To continuously monitor the effectiveness of the procedures for identifying and responding to modern slavery, ensuring that the organization remains responsive to new risks and challenges.

Actions:

- Regular Reviews of Procedures:
 - Conduct regular reviews of the modern slavery identification and response procedures to ensure they remain effective and up to date with emerging risks, legislative changes, and best practices.
- Feedback and Improvement:
 - Seek feedback from staff, Service Users, and external stakeholders on the effectiveness of the policy and procedures, making improvements as necessary.
- Auditing and Reporting:
 - Conduct audits to verify that the response to modern slavery is implemented appropriately across all areas of the organization.
 - Annual reporting on modern slavery, outlining the number of cases identified, the steps taken in response, and the outcomes of any investigations or victim support provided.

10.0 SUPPORT AND VICTIM CARE

The Support and Victim Care section of the Modern Slavery Policy and Procedures for Service 24 Support Limited is essential for ensuring that individuals who have been identified as victims of modern slavery receive the appropriate care, protection, and support to help them recover and rebuild their lives. These procedures are aligned with CQC regulations, the Modern Slavery Act 2015, and guidance from national UK institutions, including the National Crime Agency (NCA), Gangmasters and Labour Abuse Authority (GLAA), and Independent Anti-Slavery Commissioner.

The goal is to adopt a victim-centred approach, ensuring that every victim is treated with dignity, respect, and compassion and is provided with the necessary resources for their recovery. The care provided will be tailored to individual needs, ensuring a comprehensive response to the physical, psychological, legal, and social needs of the victim.

10.1 Immediate Protection and Safety for Victims

To ensure that victims of modern slavery are immediately protected from further exploitation or harm and provided with safe and secure accommodation.

Actions:

- Safe Environment:
 - Ensure immediate safety by moving victims to a secure location where they will not be at risk of further harm from perpetrators.
 - If the victim is a Service User, the Registered Manager and Modern Slavery Officer will ensure that the individual is referred to safe accommodation where they can be protected while receiving care.
- Confidentiality:
 - Ensure that the victim's identity and personal information are kept confidential at all times, in line with GDPR and Data Protection Act 2018. All records should be handled with the highest level of sensitivity and security to prevent re-trafficking or further abuse.
- Referral to Appropriate Support Services:
 - If the victim has been identified, Service 24 Support Limited will immediately initiate a referral to the National Referral Mechanism (NRM) for identification and support.
 - Provide immediate access to specialized support services, including legal assistance, housing, and financial support, as needed.
- Collaboration with External Agencies:
 - Work in partnership with law enforcement, NGOs, and local authorities to ensure that the victim's safety and well-being are prioritized and that they receive all necessary protection.

10.2 Medical and Psychological Support

To address the physical and psychological needs of victims of modern slavery, ensuring they receive comprehensive care and support to facilitate recovery.

Actions:

- Medical Care:
 - Ensure that all victims of modern slavery receive a full medical assessment upon identification. This will address any physical injuries or health conditions resulting from their exploitation.
 - Provide immediate treatment for physical health issues, including access to healthcare providers who are trained to identify and respond to injuries associated with modern slavery, such as malnutrition, trauma, sexual abuse, and neglect.
- Psychological Support:

- Provide access to mental health services for psychological assessments, trauma counselling, and long-term psychological support.
- Ensure that qualified psychologists or therapists trained in trauma and abuse are available to victims, offering confidential therapy to help them process their experiences and begin the healing journey.
- Access to Mental Health Services:
 - Offer support groups and individual therapy as part of a holistic approach to recovery, ensuring that victims can deal with the emotional trauma of exploitation.
 - Where appropriate, connect victims to long-term mental health support services, including community mental health organizations, NHS services, and charities specializing in the support of trafficking victims.

10.3 Legal and Advocacy Support

To ensure that victims of modern slavery have access to the legal support they need, including understanding their rights, obtaining justice, and navigating the legal system.

Actions:

- Legal Assistance:
 - Refer victims to legal experts specializing in immigration law, human rights, and modern slavery cases to ensure that they fully understand their rights and are able to access justice.
 - Provide guidance on the legal process, including immigration status and entitlements to remain in the country, compensation, and protection from traffickers.
- Assistance with Legal Claims:
 - Support victims in navigating the National Referral Mechanism (NRM) process, which may include referrals to legal aid services and support in applying for compensation for the abuse they have suffered.
 - Where applicable, assist victims in filing criminal complaints and seeking justice for crimes committed against them, including human trafficking, exploitation, and forced labour.
- Victim Advocacy:
 - Assign an advocate to help victims navigate the complex legal, medical, and social systems, ensuring their voice is heard and their needs are met during the recovery process.
 - The advocate will also help the victim understand their legal rights, such as access to housing, social services, and the right to participate in criminal investigations against their exploiters.

10.4 Social and Practical Support

To help victims of modern slavery rebuild their lives through practical support, including housing, employment, and social integration.

Actions:

- **Safe Housing and Accommodation:**
 - Ensure that victims are provided with safe housing in appropriate accommodation settings. This may include referrals to safe houses or specialized shelters for individuals escaping modern slavery or trafficking.
 - In the case of Service Users, coordinate with local authorities or housing providers to ensure that victims are not returned to harmful living conditions.
- **Social Support and Integration:**
 - Provide access to social support services, including help with settling into a new community, social services, and financial assistance as necessary.
 - Provide language support for victims who may face communication barriers, ensuring that translators and interpreters are available to assist with all interactions and services.
- **Employment Support:**
 - Offer training and employment support to help victims gain financial independence and reintegrate into society. This may include training programs, job readiness workshops, and support in finding appropriate work.
 - Refer victims to employment services or vocational training programs, ensuring they have the skills necessary to find suitable, safe employment.
- **Long-Term Housing:**
 - Ensure that long-term housing solutions are available for victims once they are able to leave shelters or safe houses, so they can rebuild their lives in stable, permanent living arrangements.

10.5 Referral Pathways and Coordination

To ensure that victims of modern slavery are connected to a coordinated network of support services, including legal, medical, and social care.

Actions:

- **National Referral Mechanism (NRM):**
 - All identified victims will be referred to the National Referral Mechanism (NRM) for assessment and onward referral to specialized services.
 - Ensure timely referral to NRM to ensure that victims are provided with immediate access to specialized support services and legal protection.
- **Collaboration with External Agencies:**
 - Work with external agencies, such as local authorities, charities, NGOs, and specialized support organizations to ensure that victims receive a comprehensive package of care that covers their immediate and long-term needs.

- Ensure that referrals are made to anti-trafficking organizations, including the Human Trafficking Foundation, Anti-Slavery International, and local victim support networks.
- Case Management:
 - Assign case managers who will work with the victim through their recovery process, ensuring all services are coordinated and that the victim's needs are met at every stage of the process, from immediate care to long-term rehabilitation.
 - Ensure a multi-disciplinary approach, involving healthcare professionals, legal advisors, and social services in the victim's care team to ensure their needs are met comprehensively.

10.6 Ongoing Support and Reintegration

To provide long-term support for victims, ensuring they can reintegrate into society, regain independence, and rebuild their lives.

Actions:

- Long-Term Care Plans:
 - Develop a personalized care plan for each victim, outlining their needs and the long-term support they will receive. This plan should include access to social services, mental health care, and financial support.
 - Monitor and adjust the care plan as needed, ensuring that victims continue to receive the support they require during the reintegration process.
- Emotional and Psychological Support:
 - Provide continued psychological counselling and trauma-informed care to help victims process their experiences, build resilience, and heal emotionally.
 - Offer support groups for survivors of modern slavery, providing victims with opportunities to share experiences, find solidarity, and receive continued emotional support.
- Education and Employment:
 - Provide skills development opportunities, including education programs, vocational training, and employment support, to help victims achieve long-term independence.
 - Ensure that victims are supported in finding stable employment that aligns with their interests and provides a sense of purpose and security.

10.7 Monitoring and Review

To ensure that the support and care provided to victims is effective, and that ongoing improvements are made to the care process.

Actions:

- Monitoring Victim Progress:

- Monitor the progress of each victim as they move through their recovery process. Regular follow-ups with victims should be conducted to ensure they continue to receive the support they need.
- Continuous Improvement:
 - Continuously evaluate the effectiveness of support services, making necessary adjustments to ensure the highest quality care is provided.
- Feedback Mechanisms:
 - Implement feedback mechanisms for victims to voice their opinions on the support provided and suggest improvements.

11.0 MONITORING, REPORTING, AND REVIEW

The Monitoring, Reporting, and Review procedures for the Modern Slavery Policy and Procedures for Service 24 Support Limited ensure that the organization continuously evaluates the effectiveness of its approach to preventing modern slavery, identifying risks, and supporting victims. These procedures are aligned with CQC regulations, the Modern Slavery Act 2015, and relevant guidance from national UK institutions such as the National Crime Agency (NCA), the Gangmasters and Labour Abuse Authority (GLAA), and Anti-Slavery International.

A robust monitoring and reporting system will ensure accountability, transparency, and continuous improvement in the prevention and management of modern slavery risks. Regular reviews will provide the opportunity to assess the implementation of the policy, identify gaps or areas for improvement, and adapt to emerging challenges and legal requirements.

11.1 Monitoring Modern Slavery Risk and Compliance

Objective: To systematically monitor compliance with the Modern Slavery Policy and identify emerging risks, ensuring that all aspects of Service 24 Support Limited' operations are free from modern slavery.

Actions:

- Internal Audits:
 - Conduct regular audits of recruitment, employment practices, care delivery, and supply chain management to ensure adherence to modern slavery prevention measures.
 - Audit procedures will include reviewing:
 - Recruitment and vetting processes to ensure no exploitative practices are taking place.
 - Supplier due diligence and contractual compliance with modern slavery requirements.
 - Training records to ensure all employees and contractors are properly trained on identifying and responding to modern slavery.

- Case documentation related to modern slavery incidents, ensuring that reports and investigations are thorough, documented, and properly handled.
- Risk Assessments:
 - Regularly update and assess the organization's risk register, identifying any new or emerging modern slavery risks, such as changes in the supply chain, new recruitment methods, or changes in legislation.
 - Perform periodic assessments in high-risk areas such as domestic care, temporary staffing, and subcontracted services, where the risk of exploitation is higher.
- Key Performance Indicators (KPIs):
 - Establish and track KPIs to measure the effectiveness of anti-slavery practices, such as:
 - Number of staff trained in modern slavery awareness.
 - Number of audits conducted on suppliers and contractors.
 - Number of incident reports related to suspected modern slavery.
 - Victim support outcomes, such as the number of victims referred to the National Referral Mechanism (NRM) and the successful resolution of cases.
- Feedback Mechanisms:
 - Implement feedback mechanisms for staff, Service Users, and external stakeholders to provide input on the effectiveness of anti-slavery measures. This feedback will be used to adjust and improve procedures.

11.2 Reporting Modern Slavery Incidents

To ensure that incidents or suspicions of modern slavery are reported efficiently, confidentially, and appropriately, with clear accountability for actions taken.

Actions:

- Clear Reporting Channels:
 - Establish confidential and accessible reporting channels for employees, Service Users, and external parties to report concerns related to modern slavery. This includes:
 - Hotlines for anonymous reporting.
 - Email reporting systems to allow staff to report concerns securely.
 - Designated contacts, such as the Modern Slavery Officer, to ensure the incident is properly logged, investigated, and resolved.
- Whistleblowing Mechanism:
 - Implement and promote a whistleblowing policy that encourages staff to report suspicions of modern slavery without fear of retaliation.
 - Ensure that all whistleblowing reports are thoroughly investigated, and that corrective action is taken when necessary.

- Immediate Reporting and Action:
 - Any suspected or confirmed case of modern slavery must be reported immediately to the Modern Slavery Officer and escalated to appropriate authorities (e.g., National Crime Agency (NCA), police).
 - All reports will be documented and tracked to ensure timely responses and compliance with the law.
- Incident Documentation:
 - Maintain detailed records of all reported incidents of modern slavery, including the actions taken, investigation results, and outcomes.
 - Ensure that all records are stored securely and in compliance with GDPR and Data Protection Act 2018 regulations.

11.3 Review of Modern Slavery Policy and Procedures

To regularly review and update the Modern Slavery Policy and Procedures to ensure they remain effective, compliant with legal requirements, and responsive to evolving risks.

Actions:

- Annual Policy Review:
 - Service 24 Support Limited will conduct an annual review of the Modern Slavery Policy and procedures to ensure they remain up to date with changes in legislation, emerging risks, and feedback from audits, incidents, and stakeholders.
 - The review process will include:
 - Assessing the effectiveness of the policy in addressing modern slavery risks.
 - Evaluating the impact of training programs and ensuring all staff understand their role in preventing and identifying modern slavery.
 - Updating supplier due diligence and contractor requirements to ensure modern slavery risks are continuously managed.
- Engagement with Stakeholders:
 - Consult with key stakeholders, including employees, Service Users, external partners, and anti-slavery organizations, to gather input on the effectiveness of the policy and procedures.
 - Incorporate feedback from external audits and inspections into the review process to ensure continuous improvement.
- Update Procedures Based on Emerging Risks:
 - As new risks related to modern slavery emerge (e.g., due to changes in global supply chains, new forms of exploitation, or updated legal requirements), Service 24 Support Limited will update the risk assessments, training materials, and reporting processes accordingly.

- Ensure that the policy remains responsive to any new challenges posed by modern slavery tactics and the changing landscape of exploitation.
- External Collaboration:
 - Work closely with external experts, including anti-slavery organizations, law enforcement, and NGOs, to ensure that Service 24 Support Limited is adhering to industry best practices in combating modern slavery and responding to identified cases.

11.4 Reporting and Transparency

To ensure transparency in how Service 24 Support Limited addresses modern slavery, providing accountability to stakeholders and demonstrating the organization's commitment to compliance.

Actions:

- Annual Modern Slavery Statement:
 - Publish an annual Modern Slavery Statement in compliance with the Modern Slavery Act 2015, outlining:
 - The actions taken to prevent modern slavery in operations and supply chains.
 - Case studies and outcomes from the previous year, including the number of incidents identified and how they were managed.
 - Progress on KPIs related to training, audits, and victim support.
 - Make this statement publicly available on the Service 24 Support Limited' website and ensure it is shared with all stakeholders, including employees, contractors, suppliers, and Service Users.
- Stakeholder Engagement:
 - Provide opportunities for external stakeholders (e.g., regulators, NGOs, Service Users) to provide feedback on the modern slavery measures and make recommendations for improvement.
 - Host public meetings or discussions with stakeholders to foster transparency and dialogue around modern slavery issues within the organization.
- Reporting to Regulatory Bodies:
 - Report on modern slavery incidents and actions taken to CQC and other relevant authorities as part of regular inspections and audits.
 - Document compliance with CQC safeguarding standards and the Modern Slavery Act 2015, ensuring that the organization meets all legal and regulatory obligations.

11.5 Continuous Improvement

To create a culture of continuous improvement, ensuring that Service 24 Support Limited is constantly evolving its approach to modern slavery and striving for excellence in prevention, identification, and victim support.

Actions:

- Learning from Incidents:
 - Review each modern slavery incident in detail to identify lessons learned and ensure that similar incidents are prevented in the future.
 - Adapt policies and procedures based on incident outcomes, internal audits, and feedback to improve the organization's response to modern slavery.
- Staff Involvement:
 - Engage staff in the review and improvement process, encouraging them to identify areas for improvement in modern slavery training, reporting, and victim support.
 - Foster an organizational culture of transparency and accountability, where all employees feel responsible for preventing modern slavery.
- Collaboration with External Experts:
 - Maintain collaboration with external experts in the fight against modern slavery to ensure that Service 24 Support Limited is aligned with industry best practices and learning from others in the sector.
- Innovation in Preventive Measures:
 - Invest in new technologies or training methodologies that help identify modern slavery risks and respond to them more effectively.

12.0. FORMS

VICTIM SUPPORT REFERRAL FORM

1. Victim Information

Full Name: _____

Date of Birth: _____

Gender: _____

Contact Information: _____

Nationality: _____

Address: _____

Preferred Language: _____

2. Referral Information

Referral Date: _____

Referring Agency/Individual: _____

Referral Reason: _____

Urgency of Referral (Low/Medium/High): _____

Does the victim have any known medical conditions? Yes / No

If Yes, please specify: _____

Is the victim currently in danger? Yes / No

3. Needs and Support

Does the victim require medical care? Yes / No

Does the victim require legal assistance? Yes / No

Does the victim require housing support? Yes / No

Other support needs (e.g., financial, psychological):

4. Consent

Has the victim given consent to receive support? Yes / No

Has the victim been informed about the support process? Yes / No

5. Reporting Agency Details

Agency/Organization Name: _____

Contact Person: _____

Phone Number: _____

Email Address: _____

Date of Report: _____

MODERN SLAVERY VICTIM REFERRAL FORM

1. Victim Details

Full Name: _____

Date of Birth: _____

Gender: _____

Nationality: _____

Address: _____

Phone Number: _____

Email Address: _____

Language Spoken: _____

2. Incident Details

Date of Incident: _____

Location of Incident: _____

Type of Exploitation (e.g., labour, sexual, domestic, criminal): _____

Description of Incident: _____

Has the victim been rescued? Yes / No

If Yes, please provide details of rescue operation: _____

3. Vulnerability & Needs Assessment

Does the victim require immediate medical care? Yes / No

Does the victim need psychological support? Yes / No

Does the victim need legal assistance? Yes / No

Is the victim at risk of further harm? Yes / No

Other support needs (housing, financial assistance, etc.): _____

4. Referral and Action Taken

Has the victim been referred to victim support services? Yes / No

Details of support services: _____

Referral Agency/Service: _____

Date of Referral: _____

Referral Outcome: _____

5. Reported By

Name of Reporter: _____

Organization: _____

Contact Details: _____

Date of Report _____:

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