

MODERN SLAVERY POLICY

1. Policy

[1.1] To ensure that everyone at South East London Care Ltd is aware of the Modern Slavery and Human Trafficking Policy and Procedure and the procedures in place to identify, respond appropriately and report in line with local and the national guidance. This policy refers to adults who may be at risk, the procedure for children is detailed in the Child Protection Policy and Procedure.

[1.2] This policy must be read alongside. South East London Care Ltd will ensure that staff understand Greenwich safeguarding reporting procedures and that these procedures are communicated to all staff. Other policies that relate to Modern Slavery and Human Trafficking include but are not limited to PM11 – Whistleblowing Policy and Procedure, AR01 – Child Protection Policy and Procedure, the Recruitment Policy and Procedure, the Right to Work Checks Policy and Procedure and the Agency Staff Policy and Procedure.

[1.3] To support South East London Care Ltd in meeting the Key Lines of Enquiry.

[1.4] To meet the legal requirements of the regulated activities that South East London Care Ltd is registered to provide:

- The Modern Slavery Act 2015
- Health and Safety at Work etc. Act 1974
- Human Rights Act 1998
- The Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012

2. Scope

[2.1] The following roles may be affected by this policy:

- All staff
- Registered Manager
- Other management

[2.2] The following Service Users may be affected by this policy:

- Service Users

[2.3] The following stakeholders may be affected by this policy:

- Commissioners
- Local Authority

3. Objectives

[3.1] To promote awareness of concerns surrounding slavery and human trafficking and promote the commitment of South East London Care Ltd in addressing slavery and human trafficking in all its forms. An annual statement will be produced, where applicable.

[3.2] To ensure that identification, protection, care and support for victims of modern slavery and human trafficking is at the heart of our safeguarding procedures at South East London Care Ltd.

4. Policy

[4.1] Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

[4.2] South East London Care Ltd has a zero-tolerance approach to modern slavery within the business and supply chains and we are committed to acting ethically and with integrity in all our dealings and relationships. We will implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in South East London Care Ltd or within any third parties (agencies) that we are associated with.

[4.3] All staff will be made aware of the issues surrounding slavery and human trafficking, whilst being encouraged and supported to report any concerns to South East London Care Ltd. South East London Care Ltd will also support any staff that may be subject to slavery or human trafficking.

[4.4] Where modern slavery or human trafficking is identified, South East London Care Ltd will share information with the Greenwich Safeguarding Team to safeguard the individual from harm and with the objective of preventing future situations arising, to promote the elimination of routes and sources of slavery or human trafficking.

[4.5] All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance of their roles.

[4.6] All employees who suspect any members of the workplace being victim of modern slavery must notify their line manager.

[4.7] South East London Care Ltd will take steps to ensure that sufficient communication and employee awareness training is undertaken with regards to Modern Slavery.

[4.8] All employees will be made aware of PM11 – Whistleblowing Policy and Procedure at South East London Care Ltd. The purpose of this policy and associated procedure is to enable South East London Care Ltd to thoroughly investigate allegations of any wrongdoing raised by employees within South East London Care Ltd without fear of reprisal.

[4.9] South East London Care Ltd will use this policy to underpin and inform any statement on slavery and human trafficking that we may be required to produce to meet the requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

5. Procedure

[5.1] Reporting Modern Slavery and Human Trafficking Concerns

The following procedure must take place where there are any concerns that someone is a victim of modern slavery or human trafficking. South East London Care Ltd must ensure that staff are aware that victims of modern slavery or trafficking will often not self-identify. Many will present with a different issue.

- A concern is identified - This could be a Service User as a victim or perpetrator, or a Service User informs us of a concern they have.
- If an individual is, or group of people are, in immediate risk of danger or harm, the police must be immediately notified on 999.
- The staff member must discuss this with their line manager (where appropriate) and the Patricia Onuh immediately.
- The Patricia Onuh contacts and escalates the concern immediately to Greenwich Safeguarding Adults Team.
- A notification is made to the CQC via the provider portal.

[5.2] Safer Recruitment

All staff engaged with providing services at Southeast London Care Ltd will be subject to thorough and rigorous recruitment procedures that will include a DBS check, identity check, confirmation of validity to work in the UK, employment history, suitability for the role and references. This will minimise the chance of employing a person that has been, or is subject to, slavery or human trafficking. South East London Care Ltd will follow PR16 – Right to Work Checks Policy and Procedure to ensure that a robust and fair process is followed at all times.

[5.3] South East London Care Ltd will only use staff provided by third-party organisations (such as agencies) that are either registered with the regulator or who can confirm that the staff being supplied are free to work in the UK and meet all the requirements for the role being provided for.

[5.4] Training

All staff will undertake training on Modern Slavery and Human Trafficking. This will ensure that they are aware of the indicators of modern slavery which include:

- Individuals not being paid for the work they undertake.
- Individuals being held in debt-bondage (being told they “still” owe money after having paid off a previous debt).
- An individual’s passport being held by their “employer” in order to keep the individual at work.
- Multiple benefit claimants having their benefits being paid into the same account.
- An individual not having the freedom of movement (i.e. passport being taken).
- Clear exploitation of an individual by another for financial or sexual gain
- Shows signs of physical or psychological abuse, look malnourished or unkempt, anxious/agitated or appear withdrawn and neglected. They may have untreated injuries
- Rarely be allowed to travel on their own, seem under the control, the influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work.
- Relationships which do not seem right - for example, a young teenager appearing to be the boyfriend/girlfriend of a much older adult.
- Be living in dirty, cramped or overcrowded accommodation, and/or living and working at the same address.
- Have no identification documents, have few personal possessions and always wear the same clothes day in and day out. What clothes they do wear may not be suitable for their work.
- Have little opportunity to move freely and may have had their travel documents retained, e.g. passports.
- Be dropped off/collected for work on a regular basis either very early or late at night
- Unusual travel arrangements – children being dropped off/picked up in private cars/taxis at unusual times and in places where it is not clear why they would be there.
- Avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family.

[5.5] Staff will be advised that if they are subject to slavery or human trafficking, if they are aware of any individual that may be subject to slavery or has been trafficked, or if slavery or human trafficking is disclosed to them they must inform the Registered Manager of South East London Care Ltd or the police.

[5.6] Modern Slavery Annual Reporting during COVID

The Government guidance states that under section 54 of the Modern Slavery Act 2015, certain businesses are required to publish an annual modern slavery statement setting out the steps they have taken to identify and address their modern slavery risks. During the coronavirus pandemic, it is essential that South East London Care Ltd continues to identify and address the risks of modern slavery in operations and supply chains. As well as focusing on the health and safety of workers, South East London Care Ltd will consider how fluctuations in demand and changes in the operating model may lead to new or increased risks of labour exploitation.

If South East London Care Ltd needs to delay the Modern Slavery statement:

The challenges presented by the coronavirus pandemic may mean that South East London Care Ltd will not be able to publish the statement within the usual timeframe. Where South East London Care Ltd needs to delay the publication of the modern slavery statement by up to 6 months due to coronavirus-related pressures, South East London Care Ltd understands that we will not be penalised. In the statement, South East London Care Ltd will state the reason for any delay.

[5.7] Recruitment risks during COVID-19

Some suppliers may be seeking to recruit additional workers in order to meet increases in demand. South East London Care Ltd will ensure that rigorous recruitment checks are maintained and that suppliers adhere to the same robust processes to ensure that vulnerable workers are not being exploited by third parties seeking to profit from heightened demand.

[5.8] The Health and Safety of Workers

As a responsible organisation, it is important that the relevant local or national government policies are implemented throughout the supply chain at South East London Care Ltd. South East London Care Ltd will ensure that suppliers adopt social distancing measures and pay statutory sick pay in order to prevent the spread of coronavirus as part of due diligence processes.

[5.9] Risk Assessment during COVID-19

South East London Care Ltd will undertake a risk assessment of how suppliers are operating during COVID-19 to highlight and help identify where there are risks of Modern Slavery or Human Trafficking occurring. A Template in the QCS Management system will be used where appropriate.

[5.10] Review of Effectiveness

South East London Care Ltd intends to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the supply chains of our providers. We will also continue to:

- Support our staff to understand and respond to modern slavery and human trafficking, and the impact that each and every individual working in Care can have in keeping present and potential future victims of modern slavery and human trafficking safe.
- Gain assurance that all staff at South East London Care Ltd have access to training on how to identify victims of modern slavery and human trafficking.
- Review the Safeguarding Policy and Procedure at South East London Care Ltd to ensure that Modern Slavery and Human Trafficking are integral within the content and staff are directed to support and advice as needed.

[5.11] Indicators of Forced Labour

- Individuals may show signs of psychological or physical abuse. They might appear frightened, withdrawn or confused.
- Workers may not have free movement and may always be accompanied.
- Individuals often lack protective equipment or suitable clothing and have not been trained to safely fulfil the requirements of the role.
- The person may not have access to their own documents, such as ID or their passport, with the employer having confiscated them.
- Individuals may not have a contract and may not be paid National Minimum Wage or not paid at all.
- Workers are forced to stay in accommodation provided by the employer. This accommodation could be overcrowded.
- Individuals could live onsite.
- Workers could be transported to and from work, potentially with multiple people in one vehicle.
- The person might not accept money or be afraid to accept payment.
- Workers may work particularly long hours.

6. Definitions

[6.1] Human Trafficking

Human trafficking is defined as the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

It is important not to confuse human trafficking with human smuggling. Human smuggling is also called people smuggling. Human smuggling occurs when an individual seeks the help of a facilitator to enter a country illegally, and the relationship between both parties ends once the transaction ends. Many of those who enter the UK illegally do so by this route. Human smuggling is not a form

of modern slavery.

[6.2] Turnover

“Turnover” means the amount derived from the provision of goods and services falling within the ordinary activities of the commercial organisation or subsidiary undertaking, after deduction of:

- Trade discounts
- Value added tax
- Any other taxes based on the amounts so derived (HM Government - ‘Transparency in Supply Chains’)

[6.3] Modern Slavery

Modern slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist.

[6.4] Exploitation (Modern Slavery and Human Trafficking)

- **Sexual Exploitation** - forced sex worker working in the commercial sex industry (pornography, lap dancing, telephone lines etc.); those manipulated or coerced into sexual activities of any kind for another person’s gain.
- **Modern Slavery** - human trafficking; forced labour; domestic servitude; organ harvesting.
- **Financial Exploitation** - debt bondage; finances controlled by others; financial scams; benefit fraud.
- **Criminal Exploitation** - those manipulated or coerced or trafficked for the purpose of any illegal activity i.e., County Lines/drug trafficking; cuckooing (taking over of a person’s property); forced street crime (shoplifting, begging etc.); cannabis cultivation.
- **Cultural Exploitation** - those manipulated or coerced using religious, social or cultural beliefs e.g., FGM, radicalisation, forced marriage.

[6.5] Section 52 Modern Slavery Act

This places a duty on Local Authorities to identify and refer modern slavery child victims and consenting adult victims through the National Referral Mechanism (NRM). This responsibility identifies a local authority as a First Responder. The Council as a first responder (FR) into the NRM process has a duty to notify the Home Office if anyone working within the council identifies a person with indicators suggesting they may be trafficked or enslaved.

Signed By:

Role	Name	Signature	Date
Registered Manager	Patricia Onuh		03/03/2026
Operational Lead	Kaosara Aweda		03/03/2026
Director	Posh Adetokunbo Alao		03/03/2026