

Kumra Care

Modern Slavery and Human Trafficking Policy and Procedure

1. Purpose

1.1 To ensure that everyone at Kumra Care 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 national guidance. This policy refers to adults who may be at risk, the procedure for children is detailed in the Safeguarding Children and Child Protection Policy and Procedure.

1.2 This policy must be read alongside the Safeguarding Adults Policy and Procedure. Kumra Care will ensure that staff understand Local Authority 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 the Raising Concerns, Freedom to Speak Up and Raising Concerns, Freedom to Speak Up and Whistleblowing Policy and Procedure, Safeguarding Children and 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 meet the legal requirements of the regulated activities that Kumra Care 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 Individuals may be affected by this policy:

- Individuals

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 Kumra Care 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 Kumra Care.

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 to exploit them for personal or commercial gain.

4.2 Kumra Care has a zero-tolerance approach to modern slavery within the business and supply chains. 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 Kumra Care 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 Kumra Care management. Kumra Care will also support any staff that may be subject to slavery or human trafficking.

4.4 Where modern slavery or human trafficking is identified, Kumra Care will share information with the Local Authority Safeguarding Team to safeguard the individual from harm to prevent future situations from arising, and 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 to be victims of modern slavery must notify their line manager.

4.7 Kumra Care will take steps to ensure that sufficient communication and employee awareness training is undertaken concerning Modern Slavery.

4.8 All employees will be made aware of the Raising Concerns, Freedom to Speak Up and Raising Concerns, Freedom to Speak Up and Whistleblowing Policy and Procedure at Kumra Care. The purpose of this policy and associated procedure is to enable Kumra Care to thoroughly investigate allegations of any wrongdoing raised by employees within Kumra Care without fear of reprisal.

4.9 Kumra Care 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. Kumra Care 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.

- 1) A concern is identified -This could be an Individual as a victim or perpetrator, or an Individual informing us of a concern they have.
- 2) If an individual is, or a group of people are, in immediate risk of danger or harm, the police must be immediately notified on 999.
- 3) The staff member must discuss this with their line manager (where appropriate) and Safeguarding Adult Lead Name immediately.
- 4) Safeguarding Adult Lead Name contacts and escalates the concern immediately to the Local Authority Safeguarding Adults Team.
- 5) A notification is made to the CIW via the provider portal.

5.2 Safer Recruitment

All staff engaged with providing services at Kumra Care 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 who has been or is subject to, slavery or human trafficking. Kumra Care will follow the Right to Work Checks Policy and Procedure to ensure that a robust and fair process is followed at all times.

5.3 Kumra Care 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
- Clear exploitation of an individual by another for financial or sexual gain
- Shows signs of physical or psychological abuse, looks malnourished or unkempt, anxious/agitated or appears withdrawn and neglected. They may have untreated injuries
- Rarely be allowed to travel on their own, seem under the control or 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 regularly 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, or if they are aware of any individual that may be subject to slavery or has been trafficked, or if slavery or human trafficking is disclosed to them they must inform the Registered Manager of Kumra Care or the police as soon as possible.

If a member of staff is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chain of Kumra Care constitutes any of the various forms of modern slavery, they should raise it with the Registered Manager of Kumra Care.

5.6 Modern Slavery Annual Reporting

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. Kumra Care must continue 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, Kumra Care will consider how fluctuations in demand and changes in the operating model may lead to new or increased risks of labour exploitation.

5.7 Recruitment Risks

Some suppliers may be seeking to recruit additional workers in order to meet demand increases. Kumra Care 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, the relevant local or national government policies must be implemented throughout the supply chain at Kumra Care.

5.9 Risk Assessment

Kumra Care will undertake a risk assessment of how suppliers are operating to highlight and help identify where there are risks of Modern Slavery or Human Trafficking occurring. A template available in the QCS Management system will be used where appropriate.

5.10 Review of Effectiveness

Kumra Care 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 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 Kumra Care have access to training on how to identify victims of modern slavery and human trafficking
- Review the Safeguarding Adults Policy and Procedure at Kumra Care 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 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 on-site
- 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 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) in 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

6.2 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
- Many different characteristics distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist

6.3 Exploitation (Modern Slavery and Human Trafficking)

- Sexual Exploitation – forced sex work or 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

6.4 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 the deduction of

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

6.5 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, abduction, fraud, deception, abuse of power or 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

7. Key Facts – Professionals

Professionals providing this service should be aware of the following:

- Where applicable, an annual statement on modern slavery and human trafficking will be published by Kumra Care on our website and approved by the senior management team e.g. the board of Directors and signed by a Director
- If there are cases of slavery or human trafficking then the service will share this information with the Name and Address of the Local Authority Safeguarding Adult Team
- The Modern Slavery Act 2015 details what organisations need to do about slavery and human trafficking
- Staff will receive training on Modern Slavery Human Trafficking, and be supported by Kumra Care if subject to, or reporting of, cases of slavery or human trafficking
- Only staff that have been through robust recruitment procedures will be employed at Kumra Care
- If slavery or human trafficking is disclosed to you then this must be shared with the Registered Manager or the police if someone is in immediate danger

8. Key Facts – People affected by the Service

People affected by this service should be aware of the following:

- If you are aware of or become part of any acts of modern slavery or human trafficking, this can be reported to Kumra Care and the necessary support will be provided
- You will receive care from staff who have been through robust recruitment procedures

9. Compliance, Continuous Improvement, and Accountability

Kumra Care is committed to not only meeting, but continually improving compliance with the Modern Slavery Act 2015. To ensure our practices remain effective and up to date:

- Annual Review and Audit: This policy is reviewed annually by senior management and updated in response to legislative changes, audit outcomes, or significant operational developments. Internal audits may be conducted to ensure our practices align with this policy and identify areas for improvement.
- Transparency and Accountability: As part of our commitment to transparency, we maintain records of due diligence checks, risk assessments, and staff training. Where required, we will publish a Modern Slavery Statement outlining steps we have taken

during the financial year to prevent modern slavery.

- **Corrective Action and Escalation:** Should any non-compliance or risk of modern slavery be identified, we are committed to responding swiftly with appropriate remedial actions, including investigation, supplier engagement, and, if necessary, termination of business relationships.
- **Stakeholder Engagement:** Kumra Care believes in working collaboratively with staff, service users, suppliers, and regulatory bodies to raise awareness, encourage open dialogue, and uphold ethical practices across the sector.

By embedding these processes into our governance structure, Kumra Care aims to lead with integrity, ensuring our workforce, supply chains, and practices remain free from the threat of modern slavery and human trafficking.

10. Further Reading

We recommend that you add to your understanding of this policy area by considering the following materials:

- **Elearning for Healthcare - Identifying and Supporting Victims of Modern Slavery:**
<https://www.e-lfh.org.uk/programmes/modern-slavery/>
- **Recommended Content for a Modern Slavery Statement:**
https://corporate-responsibility.org/wp-content/uploads/2017/06/Core_RecommendedcontentFINAL-1.pdf
- **Home Office - Modern Slavery Awareness and Victim Identification Guidance:**
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/655504/6.3920_HO_Modern_Slavery_Awareness_Booklet_web.pdf
- **Unseen:**
<https://www.unseenuk.org/>
- **Government Updates:**
- **Modern Slavery (Amendment) Bill:** <https://www.lexology.com/library/detail.aspx?g=712dc80b-4563-47c4-ba8e-386deaa88649>
- **GOV.UK - Piloting Devolving Decision Making for Child Victims of Modern Slavery:**
<https://www.gov.uk/government/publications/piloting-devolving-decision-making-for-child-victims-of-modern-slavery>
- **GOV.UK - Transparency in Supply Chains:**
<https://www.gov.uk/government/consultations/transparency-in-supply-chains>

11. Outstanding Practice

To be 'outstanding' in this policy area you could provide evidence that:

- Specific training is provided on slavery and human trafficking
- The publishing of a statement on slavery and human trafficking even if this is not a legal requirement
- A very high level of understanding and awareness demonstrated in all areas of the service
- Kumra Care shares its practice in this area with other organisations and is seen as a 'best practice resource'
- Kumra Care regularly audits and conducts thorough due diligence on its supply chain

Review

Policy Reviewed by: Jatin Kumra

Date: 02/06/2025