

Kumra Care

Modern Slavery and Human Trafficking Statement

1. Purpose and Organisational Commitment

Kumra Care (SSDN Health Care Ltd) is fully committed to preventing modern slavery and human trafficking within all aspects of our service delivery, workforce practices and supply chains. We operate a zero-tolerance approach and recognise our responsibility as a regulated domiciliary care provider to safeguard individuals not only from direct abuse, but also from any form of exploitation linked to employment, recruitment or third-party arrangements.

This statement reflects our commitment to the Modern Slavery Act 2015, the Human Rights Act 1998, the Social Services and Well-being (Wales) Act 2014, CIW Fundamental Standards, and the Welsh Government Code of Practice on Ethical Employment in Supply Chains.

2. Governance and Accountability

Overall accountability for modern slavery prevention sits with senior management within Kumra Care. Ethical employment, safeguarding and workforce integrity are embedded within our governance structure and monitored through internal oversight mechanisms, supervision, and compliance reviews.

Modern slavery risk is not treated as a standalone compliance issue, but as part of our wider safeguarding and quality assurance framework, ensuring alignment between workforce governance and safe care delivery outcomes.

3. Approach to Risk Identification and Prevention

We actively identify, assess and mitigate the risk of modern slavery through robust operational controls embedded across recruitment, workforce management and service delivery, including:

- Safer recruitment practices including DBS checks, right-to-work verification, employment history validation and reference checks
- Engagement only with regulated and compliant recruitment agencies
- Ongoing monitoring of workforce practices to identify signs of coercion, exploitation or unsafe working conditions

- Clear internal escalation routes for any safeguarding or workforce concerns identified during service delivery
- Avoidance of exploitative working arrangements, including unlawful employment practices or inappropriate subcontracting

These measures ensure that risks are identified at the earliest possible stage and addressed in line with safeguarding and CIW reporting requirements.

4. Frontline Safeguarding and Reporting Arrangements

All staff are trained to recognise indicators of modern slavery and human trafficking, including signs of coercion, restricted freedom, unexplained vulnerability, lack of documentation, or behavioural indicators of exploitation.

Where concerns are identified, staff are required to act without delay in line with safeguarding procedures:

- Immediate risk escalation to emergency services where required
- Internal reporting to the Designated Safeguarding Lead
- Referrals to Local Authority Adult Safeguarding teams in accordance with the Social Services and Well-being (Wales) Act 2014
- Notifications to Care Inspectorate Wales (CIW) where applicable
- Engagement with the National Referral Mechanism (NRM) where indicators of trafficking or slavery are present

This ensures a clear, consistent and legally compliant safeguarding pathway that protects vulnerable individuals.

5. Ethical Employment, Recruitment and Workforce Stability

Kumra Care is committed to ethical employment practices that promote fairness, dignity and lawful working conditions for all staff. This includes payment of at least the Real Living Wage, transparent employment contracts, and ensuring staff are supported to work in safe and regulated conditions.

We recognise that workforce stability and continuity are key safeguards against exploitation risks. As such, we prioritise consistent staffing models, regulated agency usage, and strong internal workforce oversight to reduce reliance on unstable or high-risk labour arrangements.

6. Supply Chain and Third-Party Assurance

We expect all suppliers, contractors and partner agencies to adhere to the same ethical standards expected within our own organisation. Supplier engagement is based on compliance with employment law, safeguarding expectations and ethical recruitment principles.

Where appropriate, we seek assurance that third parties operate safe and lawful employment practices consistent with Welsh Government Ethical Employment in Supply Chains guidance.

7. Training, Culture and Continuous Improvement

Modern slavery awareness is embedded within our safeguarding and workforce training programme. Staff receive training on identifying risks, understanding reporting pathways, and acting appropriately where concerns arise.

This is reinforced through supervision, reflective practice and ongoing operational learning. We actively promote a culture of openness and whistleblowing, ensuring staff feel confident to report concerns without fear of reprisal.

We continuously review and improve our approach through internal audits, incident learning, safeguarding outcomes and workforce feedback, ensuring ongoing alignment with CIW expectations of continuous improvement.

8. Conclusion

Kumra Care recognises that preventing modern slavery is integral to delivering safe, ethical and high-quality domiciliary care. Our approach ensures that safeguarding extends beyond service delivery into recruitment, workforce governance and supply chain assurance.

Through strong leadership, embedded safeguarding systems and a culture of vigilance, we ensure that individuals receiving care are supported by a workforce that is safe, lawful, and ethically recruited, and that all services are delivered in line with CIW expectations and Welsh public sector standards.