

Title of POL: Modern Slavery and Human Rights

Custodian: Chief People Officer

Version Number: 06

Issue date: 29.05.26

Review date: 29.05.27

**POLICY (POL)**

<b>Title of Policy</b>	Modern Slavery and Human Rights										
<b>What type of document is this?</b>	Policy (POL)	<b>Policy Reference Number</b>	HHH-POL-032								
<b>Purpose of POL</b>	<p>Modern slavery and human trafficking can take place in a wide range of employment sectors, including social care.</p> <p>Helping Hands is committed to ensuring there is no modern slavery or human trafficking in any part of its business. We have, and will continue to be, committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.</p> <p>The Modern Slavery Act (MSA) 2015 covers four activities:</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <td style="padding: 5px;"><b>Slavery</b></td> <td style="padding: 5px;">Exercising powers of ownership over a person</td> </tr> <tr> <td style="padding: 5px;"><b>Servitude</b></td> <td style="padding: 5px;">The obligation to provide services is imposed using coercion</td> </tr> <tr> <td style="padding: 5px;"><b>Forced or compulsory labour</b></td> <td style="padding: 5px;">Work or services are exacted from a person under menace of any penalty and for which the person has not offered themselves voluntarily</td> </tr> <tr> <td style="padding: 5px;"><b>Human trafficking</b></td> <td style="padding: 5px;">Arranging or facilitating the travel of another person with a view to their exploitation</td> </tr> </table>			<b>Slavery</b>	Exercising powers of ownership over a person	<b>Servitude</b>	The obligation to provide services is imposed using coercion	<b>Forced or compulsory labour</b>	Work or services are exacted from a person under menace of any penalty and for which the person has not offered themselves voluntarily	<b>Human trafficking</b>	Arranging or facilitating the travel of another person with a view to their exploitation
<b>Slavery</b>	Exercising powers of ownership over a person										
<b>Servitude</b>	The obligation to provide services is imposed using coercion										
<b>Forced or compulsory labour</b>	Work or services are exacted from a person under menace of any penalty and for which the person has not offered themselves voluntarily										
<b>Human trafficking</b>	Arranging or facilitating the travel of another person with a view to their exploitation										
<b>ROLES AND RESPONSIBILITIES</b>											
Include in this section details of the key roles and associated responsibilities relevant to the document											

***“Helping people live well in the homes and communities they love”***

**POLICY (POL)**

Roles	Responsibility
Chief People Officer	Is responsible for reviewing and updating this policy and ensuring that the policy is communicated across the company through the Senior Management Team(s)
Helping Hands Managers	Is responsible for implementing and embedding this policy within all teams across the company
Helping Hands Employees	Is responsible for adhering to this policy as directed by line managers

**1.0 Introduction**

Helping Hands will:

Maintain clear policies and procedures preventing exploitation and human trafficking, which protect our workforce, customers and reputation.

Lead by example by making appropriate checks on all employees, recruitment partners, suppliers etc. to ensure we know who is working for us.

Publish a clear annual Modern Slavery Statement on our website, in line with our obligations under the MSA, outlining our commitment to preventing the existence of slavery or human trafficking within our organisation.

Upload a copy of our Annual Modern Slavery Statement to the Government Registry to demonstrate our commitment to eliminating Modern Slavery from our organisation.

Seek to raise awareness within our workforce so that they can play their part in protecting colleagues and our customers if they suspect they may be a victim of modern slavery or human trafficking.

Encourage openness and support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

**POLICY (POL)**

Be ethically and socially responsible, acting with integrity and transparency in all of our business dealings.

**2.0 Reporting**

There is no typical victim of modern slavery or human trafficking, and some victims do not understand that they have been exploited and are entitled to help and support.

Talking to someone about any concerns may stop someone else from being exploited.

If you suspect someone is in immediate danger, dial 999.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, it is therefore important that in the absence of any immediate danger, you discuss your concerns first with a member of the HR Advice team before taking any further action.

The People team will decide a course of action, which may include contacting external agencies.

**3.0 Respecting Human Rights**

Human Rights are fundamental principles that allow an individual to lead a dignified and independent life, free from abuse and violations. We aspire to conduct business in ways that value and respect human rights – including our employees, customers, suppliers and anyone who is affected by our business.

We adhere to the relevant rules and regulations and work in ways that respect human rights standards.

<b>TRAINING</b>	Yes
Is training required?	

Title of POL: Modern Slavery and Human Rights

Custodian: Chief People Officer

Version Number: 06

Issue date: 29.05.26

Review date: 29.05.27

**POLICY (POL)**

Details of training	Modern Slavery awareness training is included in induction training for all carers and as a mandatory training module for all office employees.	
<b>COMPLIANCE</b>  How is compliance within this document going to be monitored?	Compliance with this policy will be monitored via line managers.	
<b>EQUALITY IMPACT ASSESSMENT AND PROCEDURAL INFORMATION</b>		
	Positive/Negative/N/A	Comments
Does the document have a positive or negative impact on one group of people over another based on their:		
• Age?	N/A	
• Disability	N/A	
• Gender assignment?	N/A	
• Pregnancy and maternity (which includes breastfeeding)	N/A	
• Race (including nationality, ethnic or national origins or colour)?	N/A	
• Marriage or civil partnership?	N/A	

***“Helping people live well in the homes and communities they love”***

Title of POL: Modern Slavery and Human Rights

Custodian: Chief People Officer

Version Number: 06

Issue date: 29.05.26

Review date: 29.05.27

**POLICY (POL)**

• Religion or belief?	N/A	
• Sex?	N/A	
• Sexual orientation?	N/A	
If you have identified any potential impact (including any positive impact which may result in more favourable treatment for one particular group of people over another), are any exceptions valid, legal and/or justifiable?	N/A	
If the impact on one of the above groups is likely to be negative:		
Can the impact be avoided?	N/A	
What alternatives are there to achieving the document's aim without the impact?	N/A	
Can the impact be reduced by taking different action?	N/A	
Is there an impact on employee, customer or someone else's privacy?	N/A	
Changes since previous version	<ul style="list-style-type: none"> <li>• Addition of training requirements</li> <li>• Updated Typo, 'MCA' to 'MSA'</li> </ul>	
Who was involved in developing /reviewing/amending the document? (list titles)	Chief People Officer People Services Director People Advisor Team Lead	
How confidential is this document	Public	Can be shared freely within and outside of Helping Hands

***"Helping people live well in the homes and communities they love"***

Helping Hands: Public

Title of POL: Modern Slavery and Human Rights

Custodian: Chief People Officer

Version Number: 06

Issue date: 29.05.26

Review date: 29.05.27

**POLICY (POL)**

References	<a href="#">Publish an annual modern slavery statement - GOV.UK</a> <a href="#">Modern Slavery Act 2015</a>	
Associated Documents		

CONTROLLED DOCUMENT