

Title of Document	Modern Slavery and Human Rights Policy
Name of Department	People Team

What type of document is this?	Policy	This sets out instructions for how a particular procedure in Helping Hands is to be routinely carried out	
Which Helping Hands POL/SOP/W.I does this document relate to?	NA	Reference number of POL/SOP/W.I	NA

Which Operational Priority/Priorities does this document link to?	Governance Framework	Superior Client Care	People, Performance & Culture	

Custodian of document	Chief People Officer	Committee/Group responsible for this document	Policy Committee
Approval date and committee chairperson signature	28.01.25	When is its next scheduled review?	28.01.26

Who does it apply to?	All Helping Hands staff at the facility / All staff at the facility					
	Does it apply to bank workers?	Yes	Does it apply to agency staff?	Yes	Does it apply to third party contractors?	Yes

Purpose of the Policy	To ensure that all staff have understanding and clarity with regards to Modern Slavery and Human Rights and to ensure that they follow company policy.
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Key Modern Slavery and Human Rights Policy Requirements

ROLES AND RESPONSIBILITIES

Role	Responsibility
Chief Executive Officer	Ensure that all areas of the business have clarity with regards to the policy and that all staff adhere to the policy guidelines.
Group Managing Director	Ensure that the policy is embedded within the organisation and to monitor relevant legislation or regulation guidelines which may impact the policy.
Directors and Managers	Ensure that the policy is implemented and embedded and monitoring any breach with regards to the policy.
All Staff	Be aware of potential indicators of slavery and adhere to the policy guidelines at all times.

1.0 MODERN SLAVERY

Modern slavery and human trafficking can take place in a wide range of employment sectors, including social care.

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.

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed using coercion
Forced or compulsory labour	Work or services are exacted from a person under menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

2.0 Purpose

Helping Hands will:

- 2.1 Maintain clear policies and procedures preventing exploitation and human trafficking, which protect our workforce, customers and reputation.
- 2.2 Lead by example by making appropriate checks on all employees, recruitment partners, suppliers etc. to ensure we know who is working for us.

- 2.3 Publish a clear annual Modern Slavery Statement on our website, in line with our obligations under the MCA, outlining our commitment to preventing the existence of slavery or human trafficking within our organisation.
- 2.4 Upload a copy of our Annual Modern Slavery Statement to the Government Registry to demonstrate our commitment to eliminating Modern Slavery from our organisation.
- 2.5 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.
- 2.6 Encourage openness and support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 2.7 Be ethically and socially responsible, acting with integrity and transparency in all of our business dealings.

3.0 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.

- 3.1 Talking to someone about any concerns may stop someone else from being exploited.
- 3.2 If you suspect someone is in immediate danger, dial 999.
- 3.3 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.
- 2.4 The HR Advice team will decide a course of action, which may include contacting external agencies.

4.0 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.

TRAINING

Is training required?	Yes
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Details of training	Mandatory training on Modern Slavery is in place for office staff. For carers awareness training is included as part of their Assessment and Induction training.
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COMPLIANCE

How is compliance with the POL going to be monitored	This policy will be monitored should there be any changes to regulation or legislation this policy will be reviewed. Any breach to company policy will be addressed by the Regional and Support office Management teams.
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EQUALITY IMPACT ASSESSMENT AND PROCEDURAL INFORMATION

	Positive / Negative / N/A	Comments
Does the document have a positive or negative impact on one group of people over another on the basis of their:		
• age?	NA	
• disability?	NA	
• gender reassignment?	NA	
• pregnancy and maternity (which includes breastfeeding)?	NA	
• Marriage and civil partnership	NA	
• race (including nationality, ethnic or national origins or colour)?	NA	
• religion or belief?	NA	
• sex?	NA	
• sexual orientation?	NA	
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?	Positive	This policy supports a fair and effective process for modern slavery management in a positive manner
If the impact on one of the above groups is likely to be negative:		
• Can the impact be avoided?	NA	
• What alternatives are there to achieving the document's aim without the impact?	NA	
• Can the impact be reduced by taking different action?	NA	
• Is there an impact on staff, client or someone else's privacy?	NA	

What was the previous version number of this document?	Version 03
Changes since previous version	Additional Section 4.0 to incorporate Human Rights
Who was involved in developing/reviewing /amending the POL?	Executive Assistant to the CEO

How confidential is this document?	Public	Can be shared freely within and outside of Helping Hands
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References	Modern Slavery Act 2015 Modern Slavery Statement published on Helping Hands company website
Associated Documents	N/A

Controlled Document