

Modern Slavery and Human Trafficking in Care Services Policy

Policy Statement

1. Introduction

This policy outlines Llewelyn Support Services' stance on any involvement or risk of involvement in activities that constitute modern slavery, human trafficking, and forced labour.

2. Scope of this Safeguarding Policy

- i. This policy applies to Llewelyn Support Services and all associated organizations involved in its operations. The policy is founded on the values, principles, and procedures of Llewelyn Support Services.
- ii. This Modern Slavery and Human Trafficking Policy's guidelines and obligations apply to all individuals working for or acting on behalf of Llewelyn Support Services Ltd in the UK at all levels, including senior managers, officers, employees, consultants, trainees, part-time and fixed-term workers, casual workers, agency workers, volunteers, and interns (collectively '**Staff Members**'), Contractors and Suppliers.

3. Legislative Framework

This policy has been developed in accordance with the safeguarding duties outlined in the Social Services and Well-being (Wales) Act 2014. Its primary aim is to protect vulnerable adults from various forms of abuse, including modern slavery, forced labour, human trafficking, and related criminal activities such as "county lines" drug trafficking. In addition, this policy is in line with the goals of the Modern Slavery Act 2015. This act outlines the responsibilities of businesses and charities to prevent any involvement with modern slavery or human trafficking. The organization acknowledges that, while it may not be compelled to submit annual reports under the act owing to its turnover, it remains steadfast in its commitment to upholding the principles and objectives of the legislation.

4. Definitions

- i. Modern slavery encompasses forced and compulsory labour, the trafficking of both children and adults, and organized activities where individuals are coerced, controlled, and exploited to engage in labour against their will for the financial benefit of others.
- ii. Human Trafficking is the recruitment, transportation, transfer, harbouring, or receipt of persons through threat, force, coercion, abduction, fraud, deception, or abuse of power for the purpose of exploitation.
- iii. Forced Labour is the work or service that is exacted from any person under the threat of a penalty and for which the person has not offered themselves voluntarily.

5. Policy Principles

- i. Llewelyn Support Services operates under a zero-tolerance policy towards modern slavery, human trafficking, and forced labour in any form.
- ii. The service is committed to safeguarding vulnerable individuals from becoming victims of modern slavery, forced labour, or human trafficking. This includes ensuring that all

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employees, contractors, and partners are aware of their responsibilities under this policy.

- iii. Llewelyn Support Services will conduct due diligence on all organizations it works with to ensure they are not involved in any activities related to modern slavery, human trafficking, or forced labour.

6. Procedures

- i. All employees, volunteers, and contractors will receive training on recognizing the signs of modern slavery, human trafficking, and forced labour. They will also be trained on the appropriate actions to take if they suspect such activities are taking place.
- ii. Any concerns or evidence of involvement in modern slavery, human trafficking, or forced labour must be reported immediately to the designated safeguarding lead. The organization will then alert the relevant authorities, including the police, and take appropriate action to safeguard the individuals involved.
- iii. Llewelyn Support Services will ensure that all partnerships and supply chains are free from any association with modern slavery, human trafficking, or forced labour. Regular assessments and audits will be conducted to monitor compliance with this policy.

7. Staff

- i. Llewelyn Support Services does not engage in employing staff under any circumstances that may leave it susceptible to allegations or suspicions of endorsing conditions tantamount to modern slavery and exploitation as defined by law.
- ii. Adherence to recruitment protocols that align with employment regulations, Social Care Wales, Care Inspectorate Wales CIW and registration requirements is mandatory for all staff. Remuneration and employment conditions are structured to comply with all statutory prerequisites.
- iii. If substantiated evidence arises implicating any of our employees in exploitation and forced labour by third parties, we are committed to fulfilling our duty of care by promptly reporting our apprehensions as whistleblowers to the appropriate law enforcement authorities or investigative bodies responsible for addressing modern slavery.
- iv. We affirm that there will be no retribution or bias against compliant employees who have adhered to all necessary employment conditions and have been recruited in accordance with the service's recruitment policies.

8. Contractors and Suppliers

- i. As a service provider, we work with many outside organizations that supply goods and services. We understand that these organizations might be part of a longer supply chain. We make sure that no link in the supply chain produces goods and services under conditions of modern slavery or human trafficking.
- ii. We expect all our contractors and suppliers to have a similar zero-tolerance approach to modern slavery and human trafficking.

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- iii. We only work with organizations that have strong anti-modern slavery policies and comply with the Modern Slavery Act 2015.
- iv. When we respond to businesses that bid for our tenders and advertisements for goods and services, we let them know that we will check if they employ people under conditions of modern slavery and if they do similar checks with other businesses in their supply chain.
- v. We expect those businesses to have taken all necessary steps to prevent their suppliers from engaging in modern slavery practices.
- vi. All employees, particularly those with responsibility for the procurement of goods and services, are required to promptly report any suspicions of modern slavery. Individuals who raise concerns regarding slavery or human trafficking impacting the care service will receive protection under the service's whistleblowing policy.

Training

- i. All employees are required to familiarize themselves with the anti-slavery policy, with particular emphasis on safeguarding vulnerable individuals, and are mandated to report any concerns in accordance with the service's safeguarding policies and procedures.
- ii. Additionally, personnel responsible for procuring goods and services will undergo training to ensure the service is never implicated in any activities that could potentially violate anti-slavery laws. This training will also cover how to appropriately respond to any suspicions or evidence of such violations.

Review

Policies and procedures will undergo regular reviews and updates to reflect changes in practice, evolving legislation, and recommendations aligned with best practices, as outlined by the Care Inspectorate Wales (CIW)

Policy Effective Date 10/08/2024

Policy to be Reviewed on 10/08/2025.

Signed:

Responsible Individual

Phillip Mpukusa

