PHSSL CARE LIMITED

CONTROLLED POLICY

B06 – MODERN SLAVERY AND EXPLOITATION POLICY

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Policy Owner	PHSSL Care Limited
Approved By	Lade Awosika, Director
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Status	Controlled Document
Applies To	All PHSSL Care Limited staff, workers and relevant contractors
Supersedes	New policy

1. Purpose

This policy sets out PHSSL Care Limited's arrangements for preventing, recognising, reporting and responding to modern slavery, human trafficking and exploitation affecting people receiving care, staff, workers or others connected with the organisation.

2. Scope

This policy applies to all PHSSL Care Limited staff, workers, managers and relevant contractors and to relevant recruitment, employment, care delivery, procurement and supply-chain activities.

3. Policy Statement

PHSSL Care Limited has zero tolerance for slavery, servitude, forced or compulsory labour, human trafficking and exploitation. Concerns will be taken seriously, immediate safety will be prioritised and appropriate safeguarding, police or specialist referrals will be considered.

4. Legal and Regulatory Framework

This policy will be applied with regard to the Modern Slavery Act 2015; Care Act 2014 and safeguarding guidance; Children Acts 1989 and 2004 where children are involved; Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, particularly Regulations 13, 17 and 19 where relevant; Human Rights Act 1998; Equality Act 2010; applicable employment and immigration law; and current CQC and statutory guidance.

5. What Modern Slavery May Include

Modern slavery may include slavery, servitude, forced or compulsory labour and human trafficking. Exploitation may involve labour, domestic servitude, sexual exploitation, criminal exploitation, forced begging or other coercive activity.

6. Indicators of Exploitation

Possible indicators include restricted freedom of movement, fearfulness, another person controlling documents or money, unexplained debt, excessive working hours, poor living conditions, threats, withholding of wages, inability to speak freely, being transported between locations, inconsistent accounts or signs of physical or psychological abuse.

7. People Receiving Care

People receiving care may be vulnerable to exploitation because of disability, dependence, isolation, communication needs, financial circumstances, coercive relationships or other factors. Staff must remain professionally curious and report concerns promptly.

8. Staff and Workers

PHSSL Care Limited will not knowingly employ or engage a person through exploitative arrangements. Staff who believe a colleague or worker may be subject to coercion, trafficking, debt bondage, withheld wages or other exploitation should raise the concern through safeguarding or speaking-up arrangements.

9. Safer Recruitment

Recruitment arrangements will include appropriate identity, right-to-work, employment-history, reference and Disclosure and Barring Service checks where applicable. Recruitment practices must not involve unlawful fees, coercion or retention of personal identity documents.

10. Recruitment Agencies and Labour Providers

Where external labour providers are used, PHSSL Care Limited will seek reasonable assurance that workers are recruited lawfully and ethically and that contractual arrangements do not facilitate exploitation.

11. Pay and Employment Practices

Workers will be paid and engaged in accordance with applicable law and agreed terms. PHSSL Care Limited will not knowingly support arrangements involving unlawful deductions, withheld wages, coercive debt or restrictions preventing a worker from leaving employment lawfully.

12. Identity Documents

Original passports, biometric documents or other personal identity documents must not be retained by PHSSL Care Limited as a means of controlling a worker. Documents may be inspected or copied where lawfully required for recruitment and compliance purposes and then handled securely.

13. Supply Chains and Procurement

PHSSL Care Limited will take a proportionate risk-based approach to suppliers and contractors. Where concerns arise about labour exploitation or modern slavery in a supply chain, management will investigate and consider corrective action, suspension, termination or referral as appropriate.

14. Immediate Danger

If a person is in immediate danger, staff must take appropriate emergency action and contact emergency services where necessary. Staff should not confront suspected traffickers or exploiters where doing so may increase risk.

15. Reporting a Concern

Any suspicion, disclosure or evidence of modern slavery or exploitation must be reported immediately to the appropriate PHSSL Care Limited manager. Safeguarding procedures must be followed where an adult at risk or child may be affected.

16. Receiving a Disclosure

Staff should listen calmly, take the person seriously, avoid leading questions, avoid making promises that cannot be kept and explain that information may need to be shared to protect them or others.

17. Safeguarding Adults

Where an adult with care and support needs may be experiencing modern slavery or exploitation, PHSSL Care Limited will consider referral under local adult safeguarding arrangements and cooperate with relevant enquiries and protection planning.

18. Children and Young People

Any suspected trafficking or exploitation of a child or young person is a safeguarding concern. Staff must refer promptly through children's safeguarding arrangements and must not assume that apparent consent removes the need for protection.

19. Police and Specialist Agencies

Management will consider referral to the police, local authority, specialist modern-slavery services or other authorised agencies according to risk and circumstances. Staff should follow professional or statutory advice when preserving evidence and supporting the person.

20. National Referral Mechanism

Where relevant, PHSSL Care Limited will cooperate with competent authorities and appropriate first responder organisations in relation to the National Referral Mechanism. Staff must not claim authority to make referrals unless PHSSL Care Limited or the individual staff role is legally authorised to do so.

21. Consent, Capacity and Coercion

Apparent agreement may not represent free consent where threats, coercion, deception, dependency or exploitation are present. Capacity, consent, safeguarding and the person's immediate safety must be considered carefully.

22. Confidentiality and Information Sharing

Information will be handled confidentially, but relevant information may be shared without consent where lawful and necessary to protect the person or others, prevent or detect serious crime, or meet safeguarding or statutory responsibilities.

23. Whistleblowing and Speaking Up

Staff who suspect that exploitation is being ignored, concealed or facilitated should use PHSSL Care Limited's Whistleblowing / Speaking Up Policy. Retaliation for raising a genuine concern in good faith is unacceptable.

24. Records and Evidence

Records must be factual, timely and secure. Staff should preserve relevant information and avoid actions that could compromise evidence or place a person at increased risk.

25. Modern Slavery Statement

Where PHSSL Care Limited is legally required to publish a slavery and human trafficking statement, it will do so in accordance with applicable requirements. Where a statement is published voluntarily, it must accurately reflect the organisation's arrangements and current position.

26. Training and Awareness

Staff will receive awareness appropriate to their roles, including recognising indicators, safeguarding, reporting routes, professional boundaries and safe responses to disclosures.

27. Staff Responsibilities

Staff must remain alert to signs of exploitation; report concerns promptly; take immediate protective action where necessary; maintain appropriate confidentiality; preserve evidence; follow safeguarding procedures; and cooperate with authorised enquiries.

28. Management Responsibilities

Management will promote ethical recruitment and employment; respond promptly to concerns; make appropriate safeguarding or external referrals; review supplier risks; maintain records; support affected people and staff; and ensure learning is implemented.

29. Monitoring and Governance

PHSSL Care Limited will review modern-slavery risks through safeguarding, recruitment, workforce, procurement, incident, complaint and governance arrangements. Identified weaknesses will result in proportionate improvement actions.

30. Related PHSSL Policies

- A01 Governance and Quality Assurance Policy
- A04 Records Management, Confidentiality and Data Protection Policy
- B01 Safeguarding Adults Policy
- B02 Safeguarding Children and Young People Policy
- B03 Whistleblowing / Speaking Up Policy

- B05 Mental Capacity, Consent and Best-Interest Decision-Making Policy
- C01 Recruitment, Selection and Safer Employment Policy
- C03 Staff Conduct, Capability and Disciplinary Arrangements Policy
- C05 Professional Boundaries and Gifts Policy
- F01 Information Sharing and Communication Policy

31. Review and Document Control

This policy will be reviewed at least annually and sooner following significant legal or regulatory change, a modern-slavery concern, safeguarding incident, inspection finding, audit finding or identified weakness. The current approved electronic version is the controlled master. Printed or locally saved copies are uncontrolled unless specifically issued and recorded as controlled copies.

Approved by	Lade Awosika
Position	Director
Approval method	Approved electronically
Approval date	September 2026
Next review date	September 2027