

MODERN SLAVERY STATEMENT

1. Relevant legislation

- The Modern Slavery Act 2015
- Health and Safety at Work etc. Act 1974
- Human Rights Act 1998
- The Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012

2. Statement Purpose

AAA Healthcare Agency Ltd has a Modern Slavery Statement that fully supports the understanding of Modern Slavery and Human Trafficking with a well led modern slavery policy that has a clear vision and credible strategy to deliver high-quality care and support, and promote a positive culture that is person-centred, open, inclusive and empowering, which achieves good outcomes for people.

This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law. It has been reviewed and updated to remove any reference to the coronavirus pandemic.

- To ensure that everyone at AAA Healthcare Agency Ltd is aware of the Modern Slavery and Human
- Trafficking Policy and Procedure and the procedures in place to identify, respond appropriately and report in line with local and the national guidance.
- This policy refers to adults who may be at risk, the procedure for children is detailed in the Safeguarding Children and Child Protection Policy and Procedure.
- AAA Healthcare Agency Ltd will ensure that staff understands Lancashire County Council safeguarding reporting procedures and that these procedures are communicated to all staff. Other policies that relate to Modern Slavery and Human Trafficking include but are not limited to the Raising Concerns, Freedom to Speak Up and Raising Concerns, Freedom to Speak Up and Whistleblowing Policy and Procedure, Safeguarding Children and Child Protection Policy and Procedure, the Recruitment Policy and Procedure, the Right to Work Checks Policy and Procedure and the Agency Staff Policy and Procedure.

3. Objective of Modern Slavery Policy

- To promote awareness of concerns surrounding slavery and human trafficking and promote the commitment of AAA Healthcare Agency Ltd in addressing slavery and human trafficking in all its forms.

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- To ensure that identification, protection, care and support for victims of modern slavery and human trafficking is at the heart of our safeguarding procedures at AAA Recruitments Solution Ltd.
- The purpose of this policy and associated procedure is to enable AAA Healthcare Agency Ltd to thoroughly investigate allegations of any wrongdoing raised by employees within AAA Healthcare Agency Ltd without fear of reprisal.

4. Organisation structure and supply chain

AAA ensures that all staff is included in the modern slavery policy with a scope that extends to all aspects of its internal policies.

- All staff
- Registered Manager
- Other management

The following Service Users may be affected by this policy:

- Service Users
- The following stakeholders may be affected by this policy:
- Commissioners
- Local Authority

5. Supply chain and the Health and Safety of Workers:

As a responsible organisation, we carefully include all the relevant local or national government policies throughout the supply chain at AAA Recruitments Solution Ltd.

6. Training Procedure

All staff will undertake training on modern slavery and human trafficking including:

- Supporting our staff to understand and respond to modern slavery and human trafficking, and the impact that each and every individual working in Care can have in keeping present and potential future victims of modern slavery and human trafficking safe
- Gaining assurance that all staff at AAA Healthcare Agency Ltd has access to training on how to identify victims of modern slavery and human trafficking.

7. Key performance indicators

AAA Healthcare Agency has in place key performance indicators of modern slavery that include:

- Individuals not being paid for the work they undertake
- Individuals being held in debt-bondage (being told they “still” owe money after having paid off a previous debt)
- An individual’s passport being held by their “employer” in order to keep the individual at work

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- Multiple benefit claimants having their benefits being paid into the same account
- Clear exploitation of an individual by another for financial or sexual gain
- Shows signs of physical or psychological abuse, looks malnourished or unkempt, anxious/agitated or appears withdrawn and neglected. They may have untreated injuries
- Rarely be allowed to travel on their own, seem under the control or influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work
- Relationships which do not seem right - for example, a young teenager appearing to be the boyfriend/girlfriend of a much older adult
- Be living in dirty, cramped or overcrowded accommodation, and/or living and working at the same Address.
- Have no identification documents, have few personal possessions and always wear the same clothes day in and day out. What clothes they do wear may not be suitable for their work.
- Have little opportunity to move freely and may have had their travel documents retained, e.g. passports.
- Be dropped off/collected for work on a regular basis either very early or late at night.
- Unusual travel arrangements - children being dropped off/picked up in private cars/taxis at unusual.
- Times and in places where it is not clear why they would be there
- Avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many
- Reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family

8. Policies in relation to slavery and human trafficking

- Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- AAA Healthcare Agency Ltd has a zero-tolerance approach to modern slavery within the business and supply chains and we are committed to acting ethically and with integrity in all our dealings and relationships. We will implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in AAA Healthcare Agency Ltd or within any third parties (agencies) that we are associated with.
- All staff will be made aware of the issues surrounding slavery and human trafficking, whilst being encouraged and supported to report any concerns to AAA Healthcare Agency Ltd Ltd management. AAA Healthcare Agency Ltd will also support any staff that may be subject to slavery or human trafficking.
- Where modern slavery or human trafficking is identified, AAA Healthcare Agency Ltd will share information with the Lancashire County Council Safeguarding Team to safeguard the individual from harm and with the objective of preventing future situations arising, to promote the elimination of routes and sources of slavery or human trafficking.
- All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

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- All employees who suspect any members of the workplace being victim of modern slavery must notify their line manager.
- AAA Healthcare Agency Ltd will take steps to ensure that sufficient communication and employee awareness training is undertaken with regards to Modern Slavery.
- All employees will be made aware of the Raising Concerns, Freedom to Speak Up and Raising Concerns, Freedom to Speak Up and Whistleblowing Policy and Procedure at AAA Healthcare Agency Ltd.

9. Risk Assessment and Review of Effectiveness

AAA Healthcare Agency Ltd will undertake a risk assessment of how suppliers are operating to highlight and help identify where there are risks of Modern Slavery or Human Trafficking occurring.

AAA Healthcare Agency Ltd intends to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the supply chains of our providers.

We will also continue to:

- Support our staff to understand and respond to modern slavery and human trafficking, and the impact that each and every individual working in Care can have in keeping present and potential future victims of modern slavery and human trafficking safe
- Gain assurance that all staff at AAA Healthcare Agency Ltd have access to training on how to identify victims of modern slavery and human trafficking.
- Review the Safeguarding Adults Policy and Procedure at AAA Healthcare Agency Ltd to ensure that Modern Slavery and Human Trafficking.

10. Further reading and guidance

We recommend that you add to your understanding in this statement by considering the following materials:

Elearning for Healthcare - Identifying and Supporting Victims of Modern Slavery:

<https://www.e-lfh.org.uk/programmes/modern-slavery/>

Recommended Content for a Modern Slavery Statement:

https://corporateresponsibility.org/wpcontent/uploads/2017/06/Core_RecommendedcontentFINAL-1.pdf

Home Office - Modern Slavery Awareness and Victim Identification Guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/655504/6.3920_H

Unseen:

<https://www.unseenuk.org/>

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Government Updates:

Modern Slavery (Amendment) Bill:

<https://www.lexology.com/library/detail.aspx?g=712dc80b-4563-47c4-ba8e-386deaa88649>

GOV.UK - Piloting Devolving Decision Making for Child Victims of Modern Slavery:

<https://www.gov.uk/government/publications/piloting-devolving-decision-making-for-child-victims-of-modern-slavery>

GOV.UK - Transparency in Supply Chains:

<https://www.gov.uk/government/consultations/transparency-in-supply-chains>

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