

Kisimul

# CO1 Modern day slavery and human trafficking

## Statement and procedure

## Document Information

<b>Document:</b>	Modern day slavery and human trafficking statement and procedure
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**Authorised document change log recorded at the back of this document**

**This document will be reviewed at least every two years**

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## 1. Introduction

The Modern Slavery Act received Royal Assent on 26<sup>th</sup> March 2015. Modern slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

This statement and procedure describes the commitment made by Kisimul to ensure that there is no modern slavery or human trafficking within the Organisation, either directly or indirectly through our supply chains.

### Key points:

- Modern slavery encompasses **human trafficking** and **slavery, servitude and forced or compulsory labour**.
- Human trafficking consists of three basic components: **action, means and purpose** of exploitation. All three components must be present in an adult trafficking case; for child trafficking the 'means' component is not required.
- In human trafficking cases, **exploitation can take many forms**, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and removal of organs.
- **Some people may not be victims of human trafficking but still victims of modern slavery if they have been subject to slavery, servitude and forced or compulsory labour.**
- **Human trafficking is not the same as human smuggling.** There are **common myths about modern slavery**, such as misconceptions that UK nationals cannot be victims and that a person cannot be a victim if they reject offers of help.

## 2. Roles and responsibilities

**All staff** are responsible for ensuring service users are protected from harm and abuse. If a member of staff suspects that a service user has been, or is, the victim of slavery they must follow Kisimul and local authority safeguarding incident reporting processes. It is important that when allegations of slavery are made employees treat them seriously, no matter from what source they arise.

The CFO or delegated finance colleague is responsible for publishing the annual modern slavery statement via the government website [Add your modern slavery statement to the statement registry - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/add-your-modern-slavery-statement-to-the-statement-registry)

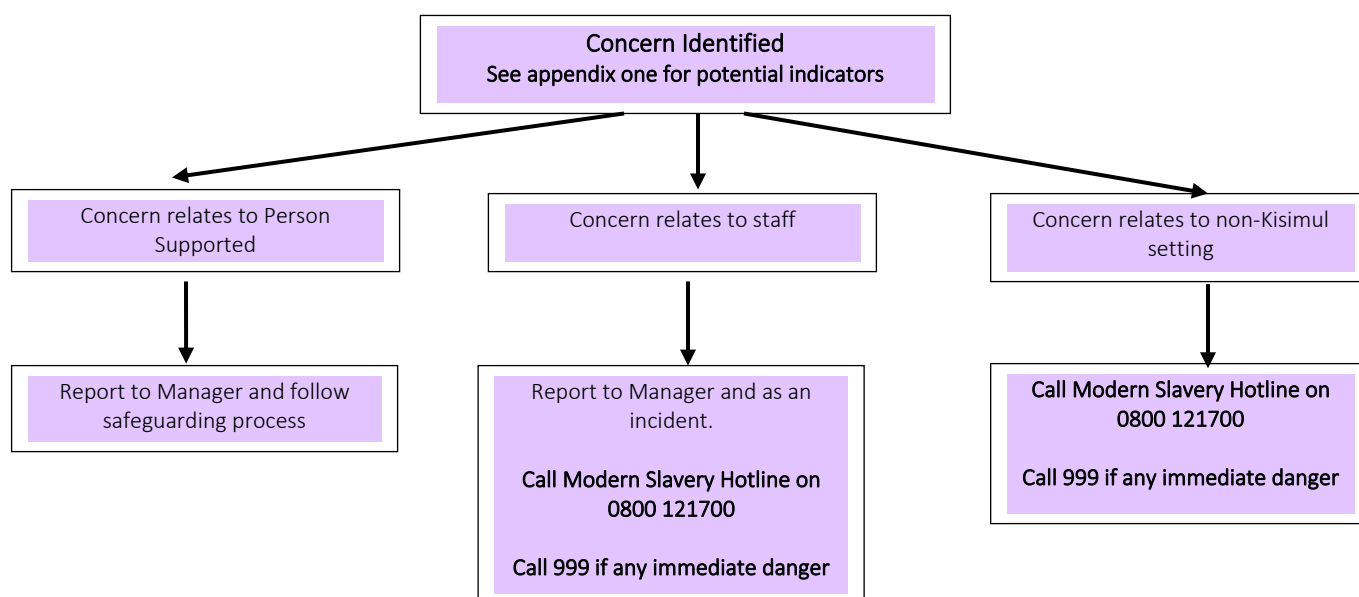
### 3. Reporting concerns about staff

Staff are expected to report immediately to their line manager if they observe, or are made aware of, concerns that may constitute slavery involving another member of staff (permanent, bank, agency or third-party contractors). If a member of staff is concerned that someone is in immediate danger, they should contact the police on 999.

### 4. Concerns outside of Kisimul

Whilst this procedure is only applicable within Kisimul, all staff should be aware that they can report any concerns they may witness outside of Kisimul to the modern slavery hotline on 0800 0121700.

### 5. Flowchart for responding to concerns



## **6. Modern day slavery statement**

Kisimul has a zero-tolerance approach towards modern slavery. We are committed to improving and continually reviewing our practices, to combat modern day slavery and human trafficking. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **About our organisation**

We are a provider of education and care services to children and adults with complex learning difficulties, challenging behaviour, autism and global development delay. We have c.1,000 employees. We have annual turnover of c.£58m.

### **Our internal supply chains**

Education and care support is provided by our employees within properties which are owned by the Group and based wholly within the United Kingdom. There is no manufacturing or distribution involved.

### **Due diligence processes for modern day slavery and human trafficking**

As part of our commitment to ensuring that there is no modern slavery or human trafficking within any of our services, departments or procured supplies we have systems in place to;

- Identify and assess potential areas of risk within our services
- Carry out strict identity, right to work, qualifications, referencing and other vetting in relation to all staff
- Ensure this procedure is widely disseminated across all locations
- Encourage the reporting of concerns and the protection of whistle blowers
- Ensure that we will not support or deal with any business knowingly involved in slavery and human trafficking.
- Identify and assess potential risk areas in our supply chains
- Monitor and mitigate potential risk areas in our supply chains.

## **Procurement of goods and services**

Any procurement functions we carry out have an important role to play in sourcing in a manner that demonstrates we are taking the necessary due diligence to keep our supply chains slavery free.

We expect the same standards from all our contractors, suppliers and other business partners. Our modern-day slavery statement applies to all persons working for us or on our behalf. We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we maintain senior relationship contact with all our suppliers, this involves director oversight and consists of involvement from the following departments as relevant: HR, Finance (procurement) and external legal review.

## **7. Training**

Modern day slavery and human trafficking forms part of safeguarding training which is completed by all staff.

## **Appendix one – Possible indicators of modern-day slavery**

Taken from;

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/896033/July\\_2020 - Statutory Guidance under the Modern Slavery Act 2015 v1.01.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896033/July_2020_-_Statutory_Guidance_under_the_Modern_Slavery_Act_2015_v1.01.pdf)

Signs of various types of slavery and exploitation are often hidden, making it hard to recognise potential victims. Victims can be any age, gender or ethnicity or nationality. Whilst by no means exhaustive, this is a list of some common signs:

- Adult is not in possession of their legal documents (passport, identification, and bank account details) and they are being held by someone else.
- The adult has old or serious untreated injuries and they are vague, reluctant, or inconsistent in explaining how the injury occurred.
- The adult looks malnourished, unkempt, or appears withdrawn.
- They have few personal possessions and often wear the same clothes.
- What clothes they do wear may not be suitable for their work.
- The adult is withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them. If they do speak, they are inconsistent in the information they provide, including basic facts such as the address where they live.
- They appear under the control/influence of others, rarely interact, or appear unfamiliar with their neighbourhood or where they work. Many victims will not be able to speak English.
- Fear of authorities.
- The adult perceives themselves to be in debt to someone else or in a situation of dependence.

### **Environmental Indicators**

Outside the property:

- There may be bars covering the windows of a property or the windows may be permanently covered from the inside.
- Curtains are always drawn; windows have reflective film or coatings applied to them.



- The entrance to the property has CCTV cameras installed.
- The letterbox is sealed to prevent use.
- There are signs the electricity may have been tacked on from neighbouring properties or directly from power lines?

Inside the property:

- Access to the back rooms of the property is restricted or the doors are locked
- The property is overcrowded and in poor repair

## Appendix two – Myths about modern-day slavery

Myth	Reality
The person did not take opportunities to escape so is not being coerced.	<p>Remaining in an exploitative situation could indicate a willingness to remain there and/or an absence of coercion. But there are many reasons why someone may choose not to escape an exploitative situation, for example:</p> <ul style="list-style-type: none"> <li>• fear of reprisal against the person or family members</li> <li>• vulnerability</li> <li>• Stockholm syndrome (psychological dependency on the person exploiting them) or grooming</li> <li>• lack of knowledge of their environment</li> <li>• belief that the trafficker or exploiter will fulfil their promise</li> <li>• fear of witchcraft</li> <li>• violence or threats of violence</li> <li>• not knowing how and where to seek help</li> </ul>
UK nationals cannot be victims of modern slavery.	UK nationals can and have been victims of modern slavery.
Crossing a border is required in order to be trafficked.	Trafficking does not have to occur across borders; it can occur within a country.
Modern slavery is a necessary evil in some cultures and so must be accepted.	<p>Abusive people may use 'culture' as a justification for modern slavery or trafficking other human beings. Modern slavery is a crime in the UK and child modern slavery is child abuse, not a 'cultural' issue.</p>
It cannot be modern slavery when organiser and victim are related, married, living together or lovers.	<p>Close relationships are often used to exploit and control others. This is especially relevant in child modern slavery. There have been numerous incidents where 'boyfriends' have groomed women and children into sexual exploitation or family members have colluded (intentionally or unintentionally) in the exploitation.</p>
A person is not a victim of modern slavery when they say they have a better life than previously.	<p>Some people are willing to tolerate their situation because they may perceive it as a 'stepping stone' to a better future and may compare it favourably to experiences at home. This doesn't mean they are not a victim of modern slavery.</p>
A person is not a victim of modern slavery when they reject an offer of help.	<p>It is not uncommon for victims to reject offers of help at first. This is not unique to victims of modern slavery.</p>

# Document Equality Impact Assessment – Part A

<b>Document Title:</b>		Modern Day Slavery and Human Trafficking Statement and Procedure	
<b>Name of person completing Equality Impact Assessment:</b>		E Ambler	
<b>Date Equality Impact Assessment completed:</b>		29.12.2021	
Characteristics	Impact		Equality Impact Assessment form completed?
	Yes	No	
Age		x	<b>If <i>No</i> comment:</b>  This policy applies to all, with no negative impact on protected characteristics.
Disability		x	
Ethnicity		x	
Gender		x	
Religion or belief		x	
Sex orientation		x	
Socio-economic		x	
Gender Reassignment		x	
Maternity/Pregnancy		x	
Marriage/Civil Partnership		x	

Equality Target Group	a) Positive Impact		b) Negative Impact		Reason/Comment
	High	Low	High	Low	
Vulnerable people	x				This policy alerts the reader to signs and actions to take if modern day slavery is suspected.

## Document Equality Impact Assessment – Part B

**What is the main purpose or aims of the policy**

To outline the procedures required where there is a suspicion of modern-day slavery

**Who will be the beneficiaries of this policy?**

Vulnerable people

**Has the policy been explained to those it might affect directly or indirectly?**

No as this is not possible

**Have you consulted on this policy?**

No this is a review and rewrite of statement and based on Home Office guidance

**What are the expected outcomes of this policy?**

A consistent response in line with national guidance

**Name of Person Completing Equality Impact Assessment:**

E Ambler

## Document change log

The document change log acts as a register of all authorised changes made to this document.

Changes will not be made unless authorised by the document owner.

Description of change	Change made by	Date document republished