

## **Policy**

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## **1. Introduction**

**Although not required to publish an annual statement setting out what we have done to eradicate slavery and human trafficking from our supply chains and operations, SHAP has chosen to produce this Policy Statement.**

- 1.2 As part of the social care sector, SHAP recognises that it has a responsibility to take a robust approach to slavery and human trafficking.
- 1.3 This policy statement sets out the steps that SHAP has taken and is continuing to take, to make sure that modern slavery is not taking place within our business or supply chain.

## **2. Application / Scope**

- 2.1 This policy statement applies to all persons working for SHAP or on its behalf in any capacity, including Board of Trustees, employees, volunteers, agency workers, seconded workers, contractors, suppliers, external consultants, third party representatives and business partners.
- 2.2 It governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

## **3. Policy Statement**

- 3.1 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 have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 3.2 SHAP has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

3.3 As an organisation committed to social justice, we expect the same high standards from all of our contractors, suppliers and other business partners in regards to modern slavery. Specific prohibitions are included as part of SHAP's contracting processes, against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude (whether adults or children), and SHAP expects that contractors, suppliers and other business partners will hold their own suppliers to these standards.

3.4 We are aware of our responsibilities towards the people we support, employees and the local community and expect all suppliers to the organisation, to adhere to the same ethical principles. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships.

#### **4. Definition**

4.1 Modern slavery is defined as the recruitment, movement, harbouring, or receiving of children and adults through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation<sup>1</sup>. It encompasses slavery, servitude, forced and compulsory labour, debt bondage, criminal and sexual exploitation and human trafficking.

#### **5. Principles / General Context and Standards of Practice**

5.1 We have zero tolerance to slavery and human trafficking; and the policies, procedures and standards of practice expected of all persons working for or on behalf of SHAP are reflective of this.

#### **5.2 Organisation Structure**

5.2.1 SHAP is a value based charitable organisation that strives to makes a real difference for people and communities. From its beginnings as a single, 8 bed hostel, SHAP is now a highly regarded, innovative, practical and financially viable charity and voluntary organisation that works to sustain communities, reduce homelessness, increase the health and wellbeing of vulnerable adults and young people and improve the life chances of the next generation. We provide:

- accommodation, support and floating support services for vulnerable and socially excluded single adults

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<sup>1</sup> Definition from *Modern Slavery and Public Health, 2017*

<https://www.gov.uk/government/publications/modern-slavery-and-public-health/modern-slavery-and-public-health>

- accommodation, support and floating support services for lone parents and couples with children who need support to improve or enhance their parenting skills and to secure permanent accommodation
- a residential family centre which monitors and assesses parents' ability to respond to their child(ren)'s needs and to safeguard and promote their welfare
- specialist accommodation for individuals who misuse alcohol and have complex needs
- private rented accommodation for those who are unable to access local authority properties and cannot afford to purchase their own home
- short-term emergency accommodation for homeless single people and families on behalf of a local authority
- Gypsy and Traveller Needs assessments on behalf of a local authority
- personal / 'life' coaching for vulnerable and socially excluded adults who wish to address unhelpful patterns of behaviour and move their lives forward
- welfare benefits advice
- advice, support and resources to members of the Black, Asian and minority ethnic communities
- advice, support, resources and resettlement services to refugees
- Supported Lodgings for previously looked after children, linking them to private householders and offering them accommodation in a family setting, preparing them for their eventual move on to independence
- nursery provision

over the Merseyside and North Wales regions.

#### 5.2.2 Our partners include:

- Halton Borough Council
- Knowsley Metropolitan Borough Council
- Liverpool City Council
- Liverpool Mutual homes
- LIVV
- Onward
- PlusDane Housing Ltd
- Regenda Homes

- Riverside Housing Association
  - St Helens Council
  - The Whitechapel Centre
- and the five boroughs partnership.

### **5.3 Our Supply Chains**

5.3.1 SHAP procures a wide range of goods and services via a diverse and varied supply chain, including:

- Property related services (maintenance and decoration)
- Communications and IT equipment services
- Temporary / Agency staff
- Recruitment agencies
- Various professional services
- Office equipment and supplies
- Utilities

5.3.2 SHAP is committed to ensuring that there is no modern slavery or human trafficking in any part of our business. We act ethically and with integrity in all our business relationships and in our relationships with our own employees. We apply consistent and appropriate recruitment and selection activities and take steps to comply with all legal requirements, ensuring fairness, equality and consistency. We expect all who have, or seek to have a business relationship with SHAP to provide assurances to SHAP by way of our procurement processes that all practice within the supplier's business is of a similar ilk.

5.3.3 We expect all who have, or seek to have a business relationship with SHAP familiarise themselves with our modern slavery policy and to act at all times in a way which is consistent with it.

### **5.4 Our Policies on Slavery and Human Trafficking**

5.4.1 SHAP is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. We have robust Human Resources policies and procedures in place and an employee Code of Conduct to ensure the fair treatment of all colleagues. We comply with all applicable employment legislation relating to employee terms and conditions, including payroll.

5.4.2 As an organisation, we operate the following policies that support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in all our operations.

- Our **Supplier Code of Conduct** reflects our commitment 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. All suppliers / contractors / consultants are asked to confirm that they understand and comply with the modern slavery act. SHAP undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers.
- In terms of **employee recruitment**, we undertake all relevant pre-employment checks prior to colleagues being employed, to ensure they are eligible to work in the UK. We carry out fair and transparent recruitment processes and ensure that our recruitment agencies comply with these requirements in the provision of agency staff.
- **Equal Opportunities:** We have a range of controls to protect staff from poor treatment and / or exploitation, which complies with all respective laws and regulations. These include provision of:
  - fair rates of pay,
  - fair terms and conditions of employment,
  - fair access to training and development
- We adhere to the principles intrinsic within our **safeguarding children and young people and safeguarding adults’ policies**. These are compliant with the local authorities’ multiagency agreements and requirements and provide clear guidance so that our employees are clear on how to raise safeguarding concerns about how people receiving our services are being treated, or about practices within our business or supply chain. We also have a safeguarding lead who will provide advice and guidance.
- We operate a **Whistleblowing** policy so that everyone employed by SHAP knows that they can raise concerns about how colleagues or people receiving support from our services are being treated or about practices within our business or supply chain, without fear of reprisals and the various ways in which they can raise their concerns.

- **Training:** Advice and training about modern slavery and human trafficking is available to staff through our safeguarding policies and procedures, mandatory safeguarding training programmes and our designated safeguarding lead. It is also discussed during staff induction which is mandatory for all of our new starters and periodically in staff team meetings.

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, SHAP requires all staff involved in procurement and recruitment to familiarise themselves with our policies and procedures to ensure understanding and support the organisation with its commitment to ensure that there is no modern slavery or human trafficking in our business or supply chains.

- Our **Corporate Social Responsibility Policy** summaries how we manage our environmental impacts and how we work responsibly with suppliers and local communities. It reflects the standards and ethics of the organisation
- We have zero tolerance to slavery and human trafficking.

## **5.5 Reporting**

- 5.5.1 We encourage anyone, including colleagues, subcontractors, suppliers and customers to report in good faith any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking to [CBU@shap.org.uk](mailto:CBU@shap.org.uk)

### **Support for victims of modern slavery**

- 5.5.2 The National Referral Mechanism (NRM) helps to identify victims of modern slavery and refers them to the organisations that can help them. Victims receive safe and secure accommodation, financial support and physical and psychological medical care. Support from NRM can be accessed by way of a first responder (i.e. police or other emergency services) or the Modern Slavery Helpline.
- 5.5.3 For anyone being trafficked or anyone who suspects someone is being trafficked, should contact the 24-hour Modern Slavery Helpline on 08000 121 700.

## **5.6 Breaches of this policy**

- 5.6.1 The prevention, detection and reporting of modern slavery in any part of SHAP's business or supply chains is the responsibility of all staff working for or on behalf of SHAP. They are required to avoid any activity that might lead to, or suggest a breach of this policy.
- 5.6.2 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.6.3 SHAP may terminate our relationship with business partners, other individuals and organisations working on our behalf, if they breach this policy.
- 5.6.4 Staff must notify their manager, Operations Manager or a member of the Central Business Unit (CBU) as soon as possible, if they believe or suspect that the policy has been breached or may occur in the future. Alternatively, they may report the matter in accordance with SHAP's Whistleblowing Policy.
- 5.6.5 Staff are encouraged to raise concerns at the earliest possible opportunity about any issue or suspicion of modern slavery in any parts of the organisation or the supply chains.
- 5.6.6 SHAP aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy or SHAP's Whistleblowing Policy, even if they turn out to be mistaken. SHAP is committed to ensuring that no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is, or may be, taking place in any part of its business activities or in any of its supply chains.
- 5.6.7 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they should inform a member of the Senior Management team or the CBU immediately. If the matter is not remedied, a member of staff can then raise it formally using SHAP's Grievance Procedure.

## **6. Roles and Responsibilities**

- The **Board of Trustees** have responsibility for monitoring this policy and its effectiveness.
- The **Chief Executive** is responsible for:
  - Approving and oversight of this policy and its effectiveness; informing the Board of Trustees of any key issues that arise
  - Ensuring operational compliance with SHAP's legal and ethical obligations



- **Operations Managers** have responsibility for:
  - Implementation of the policy
  - Ensuring operational compliance with SHAP's legal and ethical obligations, monitoring the use of the policy and effectiveness
  - Terminating the business relationship with any supplier / contractor that breaches the supplier code of conduct
  - Carrying out an investigation where there is a suspected incidence of slavery or human trafficking
  
- **All Managers** have responsibility for:
  - Ensuring that their staff understand and comply with this policy and receive adequate and regular training on it and the issue of modern slavery in supply chains.
  - Day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it
  - Must contact and work with the Central Business Unit (CBU) when looking to work with new suppliers so that appropriate checks can be undertaken
  - Ensure SHAP's zero tolerance approach to modern slavery and human trafficking is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them.
  
- **Central Business Unit** will:
  - Ensure due diligence is carried out in line with SHAP's procurement policy and procurement procedure; with all suppliers, contractors and consultants that complete an approved supplier questionnaire
  - Terminating the business relationship with any supplier / contractor that breaches the supplier code of conduct
  
- **All Employees** are required to:
  - familiarise themselves with the policy and ensure that they understand and comply with it
  - report safeguarding concerns or breaches of this policy to the CBU, a line manager or a member of the senior management team
  - avoid any activity that might lead to, or suggest a breach of this policy
  
- **Suppliers / contractors / recruitment agencies:**
  - To confirm that they understand and comply with the Modern Slavery Act.

- Adherence to our values. We have a zero tolerance to modern slavery and human trafficking and thereby expect all our suppliers / contractors follow suit.

## **7. Monitoring Observance of the Policy and Procedure**

*Verification that the policy and procedure is being followed will be undertaken through the following methods*

<b>Team Meetings</b>	✓
<b>Supervision</b>	✓
<b>Internal Audits</b>	✓
<b>Stakeholder Feedback (Staff, Clients, Other)</b>	✓
<b>Complaints, Compliments, Satisfaction Questionnaires</b>	✓
<b>Management Review Meetings</b>	✓
<b>Analysis of Non-Conformance Reporting Forms</b>	✓

Any issues / concerns identified will be looked at as part of SHAP's Continuous Improvement Procedure 027 (PRO). Lessons learned and good practice will be shared within the organisation.

## **8. Legal Framework and External Guidance**

- Modern Slavery Act 2015
- Equality Act 2010

## **9. Related Documentation**

- Code of Conduct for Suppliers / Contractors / Consultants 002 (G)
- Corporate Social Responsibility Policy 056 (POL)
- Employee Handbook
- Equality, Diversity and Inclusion Policy 022 (POL)
- Grievance Procedure 040 (PRO)


- Induction Procedure 039 (PRO)
- Procurement Policy 008 (POL)
- Procurement Procedure 012 (PRO)
- Safeguarding Adults and Young People – Guidance for Suppliers and Contractors 003 (G)
- Safeguarding Adults Policy 001 (POL)
- Safeguarding Adults Procedure 001 (PRO)
- Safeguarding Children and Young People from Child Exploitation Policy 034 (POL)
- Safeguarding Children and Young People Policy – Residential Family Centre 003 (POL)
- Safeguarding Children and Young People Policy 002 (POL)
- Safeguarding Children and Young People Procedure – Residential Family Centre 003 (PRO)
- Safeguarding Children and Young People Procedure 002 (PRO)
- Safer Recruitment and Appointment Policy 015 (POL)
- Safer Recruitment and Appointment Procedure 018 (PRO)
- Supplier Questionnaire 025 (F)
- Whistleblowing Policy 033 (POL)
- Whistleblowing Procedure 032 (PRO)

## 10. Information Circulation Checklist

*Line Managers, who needs to know about this process and how will you tell them?*

<b>Team Meeting</b>	✓
<b>Team email</b>	✓
<b>Supervision / Catch Up meetings</b>	✓
<b>Group training</b>	✓
<b>Staff Noticeboard</b>	✓
<b>Service User Meeting / update</b>	✓
<b>Partners</b>	✓
<b>Company Website</b>	✓

## **11. Review Record and Version Control**

<b>Document Title:</b>	<b>Modern Slavery (Anti-Slavery and Human Trafficking)</b>
<b>Version Number</b>	002
<b>Date of last review</b>	28/09/2021
<b>Date of next review</b>	September 2024
<b>Name(s) of staff conducting review</b>	Janine Iyanda
<b>Details of revisions made at this review</b>	Policy reviewed and reformatted. Reference included to other related documents, legislation. Inclusion of information about roles and responsibilities, definition of modern slavery, reference to processes / policies assuring SHAP's commitment and support available to victims.
<b>Circulation plan</b>	As per circulation plan in section 10
<b>Approved for circulation by</b>	 Mark Weights Chief Executive
<b>Implementation Date</b>	7 <sup>th</sup> October 2021

## **12. Amendment Record**

<b>Date</b>	<b>Description of change</b>	<b>Version No</b>	<b>Approved by</b>
01/11/2018	New policy compiled	001	Mark Weights
28/09/2021	Policy reviewed and reformatted. Reference included to other related documents, legislation. Inclusion of information about roles and responsibilities, definition of modern slavery, reference to processes / policies assuring SHAP's commitment and support available to victims.	002	

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