

# Sunderland Care and Support

Slavery and human trafficking statement

**2024–25**

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# The Modern Slavery Act 2015

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Section 54(1) of the Modern Slavery Act 2015 (the “Act”) requires commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a ‘slavery and human trafficking statement for each financial year of the organisation’.

The Act specifies two legal requirements for statements:

- Statements must be published on the organisation’s UK website with a link in a prominent place on the UK homepage. The emphasis on visibility is intended to enhance reporting standards, encouraging companies to publicly demonstrate their commitment to addressing modern slavery.
- Statements should be approved by the board of directors (or equivalent management body) and signed by a director (or equivalent). This assigns ownership to senior level management and encourages their proactive involvement in tackling abusive practices in business operations.

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 (the “Act”).

## Definition of offences

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### Slavery, servitude and forced or compulsory labour

A person commits an offence if;

- The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or;
- The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

### Human Trafficking

A person commits an offence if;

- The person arranges or facilitates the travel of another person (victim) with a view to being exploited.
- It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

## Exploitation

A person is exploited if one or more of the following issues are identified in relation to the victim;

- Slavery, servitude, forced or compulsory labour.
- Sexual exploitation
- Removal of organs
- Securing services by force, threats and deception
- Securing services from children, young people and vulnerable persons

# Introduction

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Sunderland Care and Support Ltd implement its business strategy in an ethically, socially and environmentally responsible manner. We fully acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights. The IBHR informs all of our policies related to the rights and freedoms of every individual who works for us, either as a direct Sunderland Care and Support Ltd employee, locum or agency worker or indirectly through our supply chain. We are also committed to implementing the United Nations Guiding Principles on

Business and Human Rights throughout our operations. Respect for the dignity of the individual - and the importance of each individual's human rights - form the basis of the behaviours we expect in every workplace nationally.

We will not accept any form of discrimination, harassment or bullying and we require all of our managers to implement policies designed to increase equality of opportunity and inclusion for all Sunderland Care and Support Ltd employees including locums and agency workers. We have also developed and implemented policies and processes which are intended to extend these commitments through our supply chain.

As a social care provider, we recognise our responsibility to identify any customers who may be a victim of modern slavery or human trafficking and we will ensure we adhere to our robust safeguarding procedures in work with our partners in following local modern slavery processes.

# Policies

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Sunderland Care and Support Ltd operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Recruitment and selection
- Code of conduct
- Equality and diversity
- Safeguarding of adults and children
- Whistleblowing
- Procurement and contracting
- Assurance and risk

# Direct communication

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The Company encourages members of the public or people not employed by us to write, in confidence, to the Chief Operating Officer to raise any concern, issue or suspicion of modern slavery in any part of our business.

## Suppliers

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Sunderland Care and Support Ltd uses Sunderland City Council Procurement section to operate a preferred supplier list. All council contracting and commissioning staff are suitably qualified and experienced in managing healthcare contracts and have received appropriate briefing on the requirements of the Modern Slavery Act 2015 (the Act).

Procurement section will conduct due diligence on all suppliers before allowing them to become a preferred supplier. We intend as part of our due diligence to include an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and to include our anti-slavery policy as part of our contract with all suppliers and they will be required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we will require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business › They hold their own suppliers to account over modern slavery
- For UK based suppliers, they pay their employees at least the national minimum wage / national living wage (as appropriate) and to ensure that within their own supply chains, where UK based suppliers have overseas supply chains, that their employees pay is consistent with their national minimum wage requirements, working conditions are safe and fair, there is no child labour and working hours are not excessive.
- We may terminate the contract at any time should any instances of modern slavery come to light.

# Risk assessments

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The Company encourages members of the public or people not employed by us to write, in confidence, to the Chief Operating Officer to raise any concern, issue or suspicion of modern slavery in any part of our business.

# Performance indicators

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We will know the effectiveness of the steps that we are taking to ensure that slavery is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies or local safeguarding teams to indicate that modern slavery practices have been identified.

# Safeguards

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We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring 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 our business.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

# Responsibility for this statement

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Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Board of Directors of the Company has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

## Assessment of effectiveness in preventing modern slavery

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We understand that Modern Slavery risk is not static and will continue our leading approach to mitigating this risk. We will do this by reviewing our supplier procurement processes to ensure they align our procurement processes to the principles of Ethical Trading for social care and will review the training provision for our employees.

We will publish this statement on our website and will review progress annually.

### Our plans and arrangements

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Our internal recruitment processes are highly mature and adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records. Our pay structure is derived from national collective agreements and is based on equal pay principles with rates of pay that are nationally determined.

To ensure that Modern Slavery and Human Trafficking training is available to staff and to incorporate it into the safeguarding training. In addition to that all new staff will complete safeguarding training which includes Modern day Slavery. We will ensure that additional training is available via the Safeguarding team and appropriate training is designed for our procurement team

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2024.



# Approval for this statement

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This statement was approved by the Chief Operating Officer.

Graham King

Date April 2024

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