

# Modern Slavery and Human Trafficking Policy and Procedure LHC/PP 021

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This policy is scheduled for annual review unless business needs/ legislative requirements change before this point.



**Liloom**  
HOME CARE LTD.

Impact on business assessed as: Medium

## Introduction

Liloom Home Care Limited always aims to provide the highest standards of safe, meaningful care in all our services and recognize that our services have a further impact on the communities we operate in. We must consider our ethical responsibility and integrity as well as our legal duty to have a zero-tolerance approach to modern slavery and human trafficking within the business and its supply chain. In response to this, we have implemented and enforced effective systems and controls to ensure that modern slavery is not taking place anywhere in Liloom Home Care Limited or with any third parties/ agencies associated with it.

## What is Modern Slavery and Human Trafficking?

Modern Slavery is a crime and a violation of fundamental human rights. It can take various forms such as slavery, forced and compulsory labour, servitude, and human trafficking, all of which deliberately and unlawfully deprive a person's liberty by another in order to exploit them for personal or commercial gains. Victims are exploited, held captive/ controlled and threatened or punished to stop them escaping or reporting the crime. Anyone can be a target for modern slavery, but some people are more at risk because of their protected characteristics.

Human Trafficking is where victims are taken between countries, or around a country, with the intent to exploit. Victims are often coercively controlled due to their immigration status.

## Exploitation

Exploitation is defined as the action or fact of treating someone unfairly in order to benefit from their work. There are several different types of exploitation, and it is important that we have an understand of them and the different types of exploitation that they include:

- Sexual Exploitation – forced sex work or working in the commercial sex industry (pornography, lap dancing, telephone lines etc.); those manipulated or coerced into sexual activities of any kind for another person's gain.
- Modern Slavery – human trafficking; forced labour; domestic servitude; organ harvesting.
- Financial Exploitation – debt bondage; finances controlled by others; financial scams; benefit fraud.
- Criminal Exploitation – those manipulated or coerced or trafficked for the purpose of any illegal activity i.e., County Lines/drug trafficking; cuckooing (taking over of a person's property); forced street crime (shoplifting, begging etc.); cannabis cultivation.
- Cultural Exploitation – those manipulated or coerced using religious, social, or cultural beliefs e.g., FGM, radicalization, forced marriage.

## Our actions

Liloom Home Care Limited will take steps to ensure that sufficient communication and employee awareness training is undertaken with regards to modern slavery and will encourage and support the reporting of any concerns. Where a concern is raised with regards to modern slavery or human trafficking, Liloom Home Care Limited will share information with the Bedford Borough Council Safeguarding Team to safeguard the individual from harm and with the objective of preventing future situations arising. We will promote the elimination of routes and sources of slavery or human trafficking.

*Liloom Home Care Limited will use this policy to underpin and inform any statement on slavery and human trafficking that we may be required to produce to meet the requirements of Section 54 of the Modern Slavery Act 2015 (MSA).*

## The Reporting Process

If there is any concern that someone may be a victim of modern slavery or human trafficking, Liloom Home Care Limited will follow the below reporting process.

### Modern Slavery and Human Trafficking reporting Process

A concern is identified – This could be a service user as a victim or perpetrator, in relation to a member of staff, or a stakeholder informing us of a concern they have.



If the individual, or group is in immediate danger or harm the police must be notified immediately on 999.



Any staff member who has concerns in relation to modern slavery and human trafficking must discuss this with their line manager or the Registered Manager, Victoria Robinson, immediately. A full report will be made of what is said to support the escalation of this to the safeguarding team.



The Registered Manager, Victoria Robinson, will contact and escalate the concern immediately to either Bedford Borough Council or Central Bedfordshire Council's Safeguarding Team. It is noted that the out of hours duty desk team are the same team for both local authorities.



As per regulatory requirements, a statutory notification must be made to the regulators of Liloom Home Care Limited, CQC, through the provider portal.

As part of our systems and controls to ensure that modern slavery is not taking place anywhere in Liloom Home Care Limited or with any third parties/ agencies associated with it, we signpost our teams to the National Modern Slavery Helpline. The Modern Slavery Helpline provides 24/7 free confidential advice in over 200 languages to victims, professionals, and the public.

***National Modern Slavery Helpline: 08000 121 700***

### **Safer Recruitment Processes**

All staff engaged with providing services at Liloom Home Care Limited will be subject to thorough and rigorous recruitment processes as outlined in our 'Recruitment Policy and Procedure'. This process includes DBS check, identity check, confirmation of validity to work in the UK in line with the Immigration and Asylum Act 2016. Further to this we ensure that we check employment history and hold two references for the individual alongside other documentation to confirm their suitability for the role. This process will reduce the chance of employing someone who is or has been, subject to slavery and human trafficking. Liloom Home Care Limited will ensure that this robust and fair process is followed for each applicant and will look to put further measures in place, should there be an identified need to do so, through root cause analysis processes.

### **Indicators of Modern Slavery**

All staff will undertake modern slavery and human trafficking training to ensure that they have an understanding and awareness of the indicators of modern slavery and of their duty to report, using the above clearly outlined process. This process is made readily available to all staff through our policies center. Highlighted indicators include, but are not limited to:

- 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.
- Multiple benefit claimants having their benefits being paid into the same account.
- An individual not having the freedom of movement (eg. passport being taken)
- Clear exploitation of an individual by another for financial or sexual gain
- Shows signs of physical or psychological abuse, look malnourished or unkempt, anxious/agitated or appear withdrawn and neglected. They may have untreated injuries.
- Rarely be allowed to travel on their own, seem under the control, the influence of others, rarely interact or appear unfamiliar with their neighborhood 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, eg. 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.

### **Indicators of Forced Labour**

- Individuals may show signs of physical or psychological abuse. They may present as frightened, confused or withdrawn.
- Workers may always be accompanied or may not have free movement.
- Workers are often not trained to fulfill the requirements of their job role and may lack suitable clothing or PPE to carry out their duties.
- Workers may not have access to their own personal documents such as ID and passports, these may be held by the employer.
- Workers are likely to work out of contract and may not receive the National Minimum wage or full omission of payment for works carried out.
- Workers may work particularly long hours and may live on site. Living conditions may be poor and overcrowded.

### **Our response to modern slavery, post pandemic**

The Covid 19 pandemic has placed huge strain on the services throughout the sector and this fluctuation in demand and consequently, the changes in operating models of the business may lead to new or increased risks of labour exploitation. Liloam Home Care Limited will continue to monitor this closely and follow up any changes in risks identified or legislative updates to be reflected through this policy. All rigorous checks will be maintained to ensure services remain compliant with legislative requirements, ethical and with integrity.

With such an increased demand on services, we understand our suppliers may be looking to increase their work force in order to meet demand. Liloam Home Care Limited will conduct the business with due diligence to make certain that our suppliers act responsibly and adhere to the same robust processes to ensure vulnerable people are not exploited as a result of our business or its transactions.

### **Evaluating Effectiveness**

As part of our Good Governance procedure, Liloam Home Care Limited have a commitment to continuous improvement and as a result, intends to take further steps to identify, assess and monitor potential areas of risk in modern slavery and human trafficking.

To ensure we achieve this, we shall gain assurance that all staff have access to and understanding of this policy and procedure, alongside relevant training modules to help identify victims. We shall undertake review of safeguarding processes to ensure that modern slavery and human trafficking is an integral within its content and assure that staff have clear direction to further guidance.

We will support all staff to fully understand their duties and the impact that they can have in keeping present and potential victims safe.

### **Policy formulation**

To develop this policy and procedure in line with current legislation and best practices, we have made the following considerations in its formulation.

Liloom Home Care Limited have a zero-tolerance approach to modern slavery and human trafficking within the business and its supply chain and it is everyone's responsibility. Failure to act in line with this policy and procedure constitutes gross misconduct and may lead to the termination of the working agreement or formal disciplinary action.

### **Purpose of this Policy and Procedure:**

To clearly evidence that Liloom Home Care Limited is fully aware of its ethical, integral and legal duty in regard to modern slavery and human trafficking.

To identify the process in place for identifying, responding to and reporting of modern slavery and human trafficking in line with local and national guidance.

To ensure that all staff at Liloom Home Care Limited have a full and comprehensive understanding of modern slavery and human trafficking.

To confirm and signpost staff to the correct processes in reporting, in line with Bedford Borough Council's Safeguarding Adults Team guidance.

To ensure that Liloom Home Care Limited complies with any legal requirements, guidelines and agreed ways of working.

To meet the standards expected by CQC through evidence of compliance with the CQC Quality Statements

To meet the legal requirements of the regulated activities that Liloom Home Care Limited is registered to provide:

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

### **Objectives of this Policy and Procedure:**

To promote the commitment of Liloom Home Care Limited in addressing modern slavery and human trafficking in all its forms.

To embed identification, protection, care and support for victims of modern slavery and human trafficking at the heart of our safeguarding procedures at Liloom Home Care Limited.

## **Equality Statement**

Liloom Home Care Limited have a zero-tolerance approach to modern slavery and human trafficking within the business and its supply chain and will ensure that its process is transparent and does not discriminate, either directly or indirectly because of:

- Age
- Being or becoming a transsexual/transgender person
- Being married or in a civil partnership
- Being pregnant or on maternity leave
- Disability
- Race including colour, nationality, ethnicity, or national origin.
- Religion, belief, or lack of religion/belief
- Sex
- Sexual orientation

## **Accessible information Standard**

Liloom Home Care Limited will ensure that this policy is made available in a way which meets the Accessible Information Standard and is in a format that the reader can understand.

## **Complaints**

Where a stakeholder, either internally or externally, has a complaint regarding this process, they should direct their complaint to Victoria Robinson, who will follow the Complaints, Suggestions and Compliments Policy and Procedure.

## **Confidentiality and Safeguarding**

Where a complaint or concern is raised that relates to the harm or likely harm to a service user, we will carry out our legal duty to share such information with either Bedford Borough Council or Central Bedfordshire Council Safeguarding Team to seek guidance and escalating concerns in line with local authority procedures. We will act in line with our Safeguarding Policies and Procedures, agreed ways of working and exercise our statutory duty to notify CQC. For further details please see Liloom Home Care Limited 'Safeguarding policy and procedure'.

## **Audit and Evaluation**

An annual review of this policy will take place as per the review date specified above. As part of this process we shall review the policies' effectiveness and reflect on our practice with the intension of seeking continuous improvement.