Modern Slavery and Human Trafficking Policy

PRN-89: Modern Slavery and Human Trafficking Policy
Company Name: AI Auto-Tech Ltd
Trading/Business Name: CAREHOPES
Company Registration Number: 15556946
SIC Code: 88100 – Social Work Activities Without Accommodation for the Elderly and Disabled
Email: admin@carehopes.com
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1. Policy Introduction

CAREHOPES, the trading name of AI Auto-Tech Ltd, is committed to preventing modern slavery, human trafficking, forced labour, and exploitation in all forms. As a provider of companionship services to vulnerable adults, disabled individuals, and children, the organisation recognises its responsibility to identify, report, and prevent exploitation within its operations, supply chains, and service environments.

This policy outlines how CAREHOPES ensures compliance with the Modern Slavery Act 2015 and maintains a zero-tolerance approach to exploitation.

2. Key Principles

- **Zero tolerance:** Modern slavery and human trafficking are strictly prohibited.
- **Safeguarding:** Exploitation is treated as a critical safeguarding concern.
- **Awareness:** Staff must recognise signs of trafficking and forced labour.
- **Reporting:** Concerns must be escalated immediately.
- **Compliance:** All operations align with the Modern Slavery Act 2015.
- **Transparency:** Supply chains and workforce structures must be ethical.
- **Protection:** Vulnerable individuals must be safeguarded from exploitation.

3. Policy Statement

CAREHOPES is committed to:

- Preventing modern slavery and human trafficking
- Ensuring ethical recruitment and workforce practices
- Protecting service users from exploitation
- Ensuring staff are not subjected to forced labour

- Maintaining transparent supply chains
- Reporting concerns to relevant authorities

The organisation will not work with any supplier, contractor, or partner involved in exploitation.

4. Purpose

- Prevent modern slavery and human trafficking
- Protect vulnerable individuals
- Ensure ethical workforce practices
- Provide clear reporting procedures
- Strengthen safeguarding through exploitation awareness
- Ensure compliance with UK legislation

5. Scope

This policy applies to:

- Employees
- Volunteers
- Contractors
- Agency workers
- Zero-contract workers (**PRN-149**)
- Suppliers
- External partners

It covers exploitation concerns arising in:

- Service user homes
- Community settings
- Recruitment processes
- Workforce management
- Supply chains
- Digital environments

6. Related Policies (Selected ONLY from relevant categories)

Safeguarding & Protection

- **PRN-003** Adult Safeguarding Policy
- **PRN-136** Safeguarding Children Policy
- **PRN-144** Child Abuse Policy
- **PRN-116** Domestic Abuse Policy
- **PRN-131** Prevent Duty Awareness Policy
- **PRN-056** Mental Capacity Act Policy
- **PRN-070** Safeguarding Reporting and Escalation Procedure

Conduct, Ethics & Behaviour

- **PRN-014** Code of Conduct Policy
- **PRN-015** Code of Ethics
- **PRN-099** Professional Boundaries Policy
- **PRN-004** Anti Harassment & Anti Discrimination Policy
- **PRN-105** Anti-Bribery Policy
- **PRN-106** Anti-Fraud Policy

Human Resources & People Management

- **PRN-065** Recruitment and Selection Policy
- **PRN-125** Induction Policy
- **PRN-115** Disciplinary Policy
- **PRN-124** Grievance Policy
- **PRN-132** Probation Policy
- **PRN-032** Employee Wellbeing Policy
- **PRN-149** Zero Contract Policy

Governance & Oversight

- **PRN-123** Governance and Accountability Policy
- **PRN-102** Compliance Monitoring
- **PRN-063** Quality Audit and Service Inspection Procedure

Digital & Information Governance

- **PRN-112** Data Protection and GDPR Policy
- **PRN-023** Confidential Information Management Policy
- **PRN-024** Confidentiality Policy

7. Definitions

Modern Slavery: The severe exploitation of individuals for personal or commercial gain.

Human Trafficking: The recruitment, movement, or harbouring of individuals through coercion, deception, or force for exploitation.

Forced Labour: Work performed involuntarily under threat, coercion, or manipulation.

Zero-Contract Worker: A non-permanent worker engaged under PRN-149 Zero Contract Policy.

8. Recognising Signs of Modern Slavery

Companions must be alert to:

- Signs of control or coercion
- Individuals unable to speak freely
- Fearful or withdrawn behaviour
- Lack of access to personal documents
- Signs of physical abuse
- Debt bondage
- Excessive working hours
- Confiscated wages
- Third parties speaking on behalf of the individual
- Restricted movement
- Poor living conditions

9. Companion Responsibilities

9.1 Safeguarding

Companions must:

- Treat exploitation as a safeguarding emergency
- Report concerns immediately
- Avoid confronting suspected perpetrators

- Protect service users from harm

9.2 Professional Boundaries

Companions must:

- Avoid involvement in financial arrangements
- Avoid transporting individuals without approval
- Avoid accepting gifts or favours
- Maintain neutrality and safety

9.3 Ethical Conduct

Companions must:

- Uphold organisational values
- Support vulnerable individuals sensitively
- Maintain confidentiality
- Document concerns accurately

10. Workforce Protection

CAREHOPES ensures:

- Ethical recruitment practices
- No forced labour
- No recruitment fees
- No withholding of documents
- Fair treatment of zero-contract workers
- Transparent employment terms
- Access to grievance procedures

11. Supply Chain Responsibility

The organisation will:

- Vet suppliers for ethical compliance
- Terminate relationships with unethical suppliers
- Require transparency in subcontracting
- Monitor supply chain risks regularly

12. Reporting Modern Slavery Concerns

Companions must:

- Report immediately to the DSL
- Document factual observations
- Contact emergency services if danger is imminent
- Cooperate with authorities

External reporting may involve:

- Police
- Local Authority
- National Referral Mechanism (NRM)
- Safeguarding boards

13. Confidentiality

Information is shared only:

- With safeguarding authorities
- With emergency services
- On a strict need-to-know basis

Records must be stored securely.

14. Training Requirements

Staff must receive training in:

- Modern slavery awareness
- Human trafficking indicators
- Safeguarding
- Professional boundaries
- Trauma-informed practice
- Ethical recruitment awareness

15. Documentation & Record Keeping

Records must include:

- Observations

- Reports
- Actions taken
- Safeguarding escalations
- Communication with authorities

Records must be stored securely.

16. Policy Review

This policy will be reviewed annually or sooner if required due to:

- Legislative changes
- Safeguarding updates
- Organisational changes
- Audit findings