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| **Modern Slavery & Human Trafficking Policy** |
| Version 1.2 |
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| **Turner Martin (Mr)****06 March 2020** |
| **A. Confidentiality Notice** |

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C. Document Details

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E. Definitions

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| “The Practice”, “We” | On behalf of The Partners of Staveleigh Medical Centre |
| “CCG” | Clinical Commissioning Group for Tameside and Glossop |
| “Office”, “Officers” | Responsible persons for policy |
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F. Persons Whom Policy Applies to

Staff, faculties, visitors, stakeholders and other persons or bodies affected by or for whom this policy applies to:

* All Practice staff.
* The Partners.

G. Responsible Office

Office or officers charged with developing, updating, communicating, training, ensuring compliance with, and providing resources to promote adherence to this issued policy:

* Practice Manager
* The Partners

H. Introduction

Modern slavery is constituted in the [Modern Slavery Act 2015](http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted) by the offences of slavery, servitude and forced or compulsory labour and human trafficking. Despite an increase in efforts by many organisations to ensure that they implement ethical practices and policies to prevent the exploitation of workers in their own organisation and global supply chains, there are still many organisations that ignore abuses and are responsible for practices and policies that result in workers being subjected to modern slavery.

**What is a modern slavery statement?**

The Modern Slavery Act 2015 contains a provision which requires certain businesses to produce a statement setting out the steps taken by the organisation within the financial year to ensure there is no modern slavery in their own business and their supply chains. The aim is to ensure that organisations are taking visible steps to prevent modern slavery, not just because they are legally obliged to do so, but because they recognise that it is the right thing to do.

An organisation’s modern slavery statement sets out what steps they have taken to ensure that modern slavery is not occurring in any part of their supply chains or organisation and the organisation must be transparent about what is happening within the business.

I. Practice Statement

As a public sector body, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and are absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Staveleigh Medical Centre has a zero-tolerance approach to modern slavery.

We are committed to acting ethically and with integrity 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 businesses or those of our suppliers.

The nature of our business means that the risk of modern slavery in our directly managed business activities and the first line of our supply chain is low. We require all our suppliers to have robust anti-slavery and human trafficking arrangements in place. If a supplier is found to be accepting of slavery in their business or supply chain we will terminate the contract and notify the relevant authorities.

J. Operational Implementation and Procedures

Staveleigh Medical Centre pledges that:

* All staff will receive guidance explaining what modern slavery is, how to identify it, and how to log concerns.
* All recruited permanent and temporary staff are subjected to identification and background checking.
* All wages and remuneration will meet or exceed guidelines outline in the [National Minimum Wage Act 1998.](http://www.legislation.gov.uk/ukpga/1998/39)
* We continued to discuss Modern Slavery policy with our suppliers through our contract management processes.
* It will be logged with the authorities such as the CCG (Safeguarding Team) and GMC of any concerns that Modern slavery or human trafficking activity was occurring in our organization or supply chain.
* We will continuously review whether there were any specific suppliers that require further intervention activity to reasonably satisfy us that steps were being taken to prevent modern slavery and trafficking in their supply chains.
* Audit activity will be conducted with a random sample of suppliers to confirm compliance with a number of criteria, including the Modern Slavery and Human Trafficking Policy.

G. Statement Publication

Staveleigh Medical Centre will endeavour to publish their statement as soon as possible after their financial year end. This should be, at most, within six months of the organisation’s financial year end.

The statement needs to be approved and signed by an appropriate senior person in the business to ensure senior level accountability.

The statement should be included on the organisation’s website and include a link in a prominent place on its homepage. A copy of the statement is to be provided to anyone who requests one in writing. The copy must be provided to the requestor within 30 days of the receipt of the request.

K. Additional Information

None recorded.

I. References & Further Resources

Modern Slavery Act 2015. (Chapter 30). [online]. Norwich: The Stationary Office (TSO). [Accessed 01 March 2020]. <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>.

National Minimum Wage Act 1998. (Chapter 39). [online]. Norwich: the Stationary Office (TSO). [Accessed 01 March 2020]. <http://www.legislation.gov.uk/ukpga/1998/39>

M. Appendices

* Appendix 1 - Modern Slavery Leaflet

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| **Appendix 1 – Modern Slavery Leaflet (Tameside & Glossop CCG, 2020)** |

Modern Slavery & Human Trafficking

**Modern slavery** includes:

* Slavery
* Human trafficking and exploitation
* Forced labor 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.

Slavery is not an issue confined to history or an issue that only exists in certain countries – it is something that is still happening today. It is a global problem and the UK is no exception. It is a growing issue, affecting men, women and children.

Modern slavery encompasses slavery, servitude, forced and compulsory labor and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment.

The scale of modern slavery in the UK is significant. Modern slavery crimes are being committed across the country and there have been year on year increases in the number of victims identified. The Home Office has estimated that in 2013 there were between 10,000 and 13,000 potential victims of modern slavery in the UK.

The **Modern Slavery helpline** can be contacted on **0800 0121 700** or via their website at  [www.modernslaveryhelpline.org](https://www.modernslaveryhelpline.org/%22%20%5Ct%20%22_blank)

The Modern Slavery Helpline provides information and advice about modern slavery, a 24 hour telephone reporting line, online reporting through the website.

<https://www.manchestersafeguardingpartnership.co.uk/resource/modern-slavery/>

**GENERAL INDICATORS (taken from https://www.modernslaveryhelpline.org/about/spot-the-signs)**

**Physical Appearance**

• Shows signs of physical or psychological abuse, look malnourished or unkempt, anxious/ agitated or appear withdrawn and neglected. They may have untreated injuries

**Isolation**

• Rarely be allowed to travel on their own, seem under the control, influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work

• Relationships which don’t seem right – for example a young teenager appearing to be the boyfriend/ girlfriend of a much older adult.

**Poor living conditions**

• Be living in dirty, cramped or overcrowded accommodation, and / or living and working at the same address

**Restricted freedom of movement**

• Have no identification documents, have few personal possessions and always wear the same clothes day in 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, e.g. passports

**Unusual travel times**

• 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 isn’t clear why they’d be there

**Reluctant to seek help**

• 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.

**THE FOLLOWING SIGNS COULD INDICATE A SITUATION OF LABOUR EXPLOITATION:**

* Individuals may show signs of psychological or physical abuse. They might appear frightened, withdrawn or confused
* Workers may not have free movement and may always be accompanied
* Individuals often lack protective equipment or suitable clothing and have not been trained to safely fulfil the requirements of the role
* The person may not have access to their own documents, such as ID or their passport, with the employer having confiscated them
* Individuals may not have a contract and may not be paid National Minimum Wage or not paid at all
* Workers are forced to stay in accommodation provided by the employer. This accommodation could be overcrowded
* Individuals could live on site
* Workers could be transported to and from work, potentially with multiple people in one vehicle
* The person might not accept money or be afraid to accept payment
* Workers may work particularly long hours

**THE FOLLOWING SIGNS COULD INDICATE A SITUATION OF SEXUAL EXPLOITATION:**

* Sex workers may appear scared or intimidated
* The individual may be transported to and from clients
* Individuals may be closely guarded
* The person may be 'branded' with a tattoo indicating ownership
* Sex workers may show signs of physical abuse, including bruising, scarring and cigarette burns
* The individual may be unable to keep payment and may have restricted or no access to their earnings
* The person may have a limited English vocabulary, restricted to sexualised words
* Multiple female foreign nationals may be living at the same address
* The person may sleep in the premise in which they work, which could indicate a brothel is operating
* A property might have male callers day and night who only stay for a short time
* There may be details of sexual activity such as cards and advertisements found nearby

**THE FOLLOWING SIGNS COULD INDICATE A SITUATION OF DOMESTIC SERVITUDE:**

* The individual may be held in their employer's home and forced to carry out domestic tasks such as providing child care, cooking and cleaning
* The individual may not be able to leave the house on their own, or their movements could be monitored
* The person may work in excess of normal working hours
* The individual may not have access to their own belongings, including their ID, but also items such as their mobile phone, which can isolate them
* The employer may be abusive, both physically and verbally
* The person may not interact often with the family they are employed by
* The person may be deprived of their own personal living space, food, water or medical care
* The individual may stand out from other family members, noticeable as they may wear poorer quality clothing

**THE FOLLOWING SIGNS COULD INDICATE A SITUATION OF CRIMINAL EXPLOITATION:**

* A large group of adult or children beggars might be moved daily to different locations but return to the same location every night. This could indicate forced begging
* An individual might be transported to or from the scene of a crime, including shoplifting, pick-pocketing or forced begging
* An individual may not benefit from the money or items they have obtained through the crimes they have been forced to commit
* A person may be forced to cultivate cannabis with their freedom of movement restricted; including being locked in a room. It is common that the individual may not be able to speak English, or have a limited vocabulary
* A vulnerable person may be forced or manipulated out of their home by drug dealers who use the home as a base to sell drugs
* Young people may be forced to transport and sell drugs across county borders, which is known as 'County Lines'.

**THE FOLLOWING SIGNS COULD INDICATE A SITUATION OF CHILD EXPLOITATION:**

* The child may have mood swings, including being angry, upset or withdrawn
* The child may show signs of inappropriate sexual behaviour
* They may be dressed inappropriately for their age
* The child may go missing at night or weekends and may not be clear about their whereabouts
* They may not attend school
* The child may have gifts, presents or expensive items which they cannot explain

If it was thought to be an emergency and immediate threat to life please ring 999, otherwise

If you notice any of these signs please discuss with a senior colleague, safeguarding lead in your practice, CCG Safeguarding Team 0161 342 5619, or the helpline **0800 0121 700**

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