





Document:	Modern day slavery and human trafficking statement and procedure
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## 1. Introduction

The Modern Slavery Act received Royal Assent on 26<sup>th</sup> March 2015. Modern slavery encompasses slavery, human trafficking, forced and compulsory labour 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.

The CFO or delegated finance colleague is responsible for publishing the annual modern slavery statement via the government website [Add your modern slavery statement to the statement registry - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/add-your-modern-slavery-statement-to-the-statement-registry)

3. Reporting concerns about staff

Staff are expected to report immediately to their line manager if they observe, or are made aware of, concerns that may constitute slavery involving another member of staff (permanent, bank, agency or third-party contractors). If a member of staff is concerned that someone is in immediate danger, they should contact the police on 999.

4. Concerns outside of Kisimul

Whilst this procedure is only applicable within Kisimul, all staff should be aware that they can report any concerns they may witness outside of Kisimul to the modern slavery hotline on 0800 0121700.

## 6. Modern day slavery statement

Kisimul has a zero-tolerance approach towards modern slavery. We are committed to improving and continually reviewing our practices, to combat modern day slavery and human trafficking. We are committed 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.

### About our organisation

We are a provider of education and care services to children and adults with complex learning difficulties, challenging behaviour, autism and global development delay. We have c.1,000 employees.

We have annual turnover of c.£58m.

### Our internal supply chains

Education and care support is provided by our employees within properties which are owned by the Group and based wholly within the United Kingdom. There is no manufacturing or distribution involved.

## Procurement of goods and services

Any procurement functions we carry out have an important role to play in sourcing in a manner that demonstrates we are taking the necessary due diligence to keep our supply chains slavery free.

We expect the same standards from all our contractors, suppliers and other business partners. Our modern-day slavery statement applies to all persons working for us or on our behalf. We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we maintain senior relationship contact with all our suppliers, this involves director oversight and consists of involvement from the following departments as relevant: HR, Finance (procurement) and external legal review.

## 7. Training

Modern day slavery and human trafficking forms part of safeguarding training which is completed by all staff.

## Appendix one Possible indicators of modern-day slavery

Taken from;

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/896033/July\\_2020\\_-\\_Statutory\\_Guidance\\_under\\_the\\_Modern\\_Slavery\\_Act\\_2015\\_v1.01.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896033/July_2020_-_Statutory_Guidance_under_the_Modern_Slavery_Act_2015_v1.01.pdf)

Signs of various types of slavery and exploitation are often hidden, making it hard to recognise potential victims. Victims can be any age, gender or ethnicity or nationality. Whilst by no means exhaustive, this is a list of some common signs:

Adult is not in possession of their legal documents (passport, identification, and bank account details) and they are being held by someone else.

The adult has old or serious untreated injuries and they are vague, reluctant, or inconsistent in explaining how the injury occurred.

The adult looks malnourished, unkempt, or appears withdrawn.

They have few personal possessions and often wear the same clothes.

What clothes they do wear may not be suitable for their work.

The adult is withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them. If they do speak, they are inconsistent in the information they provide, including basic facts such as the address where they live.

They appear under the control/influence of others, rarely interact, or appear unfamiliar with their neighbourhood or where they work. Many victims will not be able to speak English.

Fear of authorities.

The adult perceives themselves to be in debt to someone else or in a situation of dependence.

## Environmental Indicators



The entrance to the property has CCTV cameras installed.

The letterbox is sealed to prevent use.

There are signs the electricity may have been tacked on from neighbouring properties or directly from power lines?

Inside the property:

Access to the back rooms of the property is restricted or the doors are locked

The property is overcrowded and in poor repair

## Appendix two Myths about modern-day slavery

Myth	Reality
The person did not take opportunities to escape so is not being coerced.	<p>Remaining in an exploitative situation could indicate a willingness to remain there and/or an absence of coercion. But there are many reasons why someone may choose not to escape an exploitative situation, for example:</p> <ul style="list-style-type: none"> <li>• fear of reprisal against the person or family members</li> <li>• vulnerability</li> <li>• Stockholm syndrome (psychological dependency on the person exploiting them) or grooming</li> <li>• lack of knowledge of their environment</li> <li>• belief that the trafficker or exploiter will fulfil their promise</li> <li>• fear of witchcraft</li> <li>• violence or threats of violence</li> <li>• not knowing how and where to seek help</li> </ul>
UK nationals cannot be victims of modern slavery.	UK nationals can and have been victims of modern slavery.
Crossing a border is required in order to be trafficked.	Trafficking does not have to occur across borders; it can occur within a country.
Modern slavery is a necessary evil in some cultures and so must be accepted.	<p>Abusive people may use 'culture' as a justification for modern slavery or trafficking other human beings.</p> <p>Modern slavery is a crime in the UK and child modern slavery is child abuse, not a 'cultural' issue.</p>
It cannot be modern slavery when organiser and victim together or lovers.	

Document Title:	Modern Day Slavery and Human Trafficking Statement and Procedure	
Name of person completing Equality Impact Assessment:	E Ambler	
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Characteristics	Impact	Equality Impact Assessment form completed?

What is the main purpose or aims of the policy

To outline the procedures required where there is a suspicion of modern-day slavery

Who will be the beneficiaries of this policy?

Vulnerable people

Has the policy been explained to those it might affect directly or indirectly?