A-A Quality Care Ltd
4 Mistley Gardens Hookwood Horley Surrey RH6 0BD

Review Sheet

Last Reviewed	Last Amended	This policy will be reviewed as needs require or at the following interval:
6 Jun 2025	3 Aug 2023	Annual

Business Impact:	LOW — Minimal action required. Circulate information amongst relevant parties.
Reason for this Review:	Scheduled review
Changes Made:	No
Summary:	This policy has been reviewed with no significant changes. The references and further reading links have been checked and updated. Future reviews will take place on an annual basis.
Relevant Legislation:	• Health and Safety at Work etc. Act 1974 • Human Rights Act 1998 • The Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012 • The Modern Slavery Act 2015
Underpinning Knowledge:	• Author: GOV.UK, (2021), Publish an annual modern slavery statement [Online] Available from: https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement [Accessed: 06/06/2025] • Author: Human Trafficking Foundation, (2018), Human Trafficking Foundation Policy - Improving Victim Support [Online] Available from: https://www.humantraffickingfoundation.org/policy [Accessed: 06/06/2025] • Author: HM Government: Home Office, (2022), Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland [Online] Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/939411/Modern_Slavery_Statutory_Guidance_EW_Non-Statutory_Guidance_SNI_v1.03_.pdf [Accessed: 06/06/2025] • Author: HM GOVERNMENT, (2023), National referral mechanism guidance: adult (Northern Ireland and Scotland) [Online] Available from: https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/national-referral-mechanism-guidance-adult-northern-ireland-and-scotland [Accessed: 06/06/2025] • Author: UK Government Modern Slavery Statement, (2021), UK government modern slavery statement [Online] Available from: https://www.gov.uk/government/publications/uk-government-modern-slavery-statement [Accessed: 06/06/2025]

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	• Author: HM Government, (2015), Modern Slavery Act 2015 [Online] Available from: https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted [Accessed: 06/06/2025] • Author: Salvation Army, (2020), Modern slavery [Online] Available from: https://www.salvationarmy.org.uk/modern-slavery [Accessed: 06/06/2025] • Author: HM Government, (2023), National referral mechanism guidance: adult (England and Wales) [Online] Available from: https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales [Accessed: 06/06/2025] • Author: Social Care Institute for Excellence, (2020), Safeguarding adults - Types and indicators of abuse [Online] Available from: https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse [Accessed: 06/06/2025] • Author: HM Government, (2021), Slavery and human trafficking in supply chains: guidance for businesses [Online] Available from: https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide [Accessed: 06/06/2025] • Author: HM Government: Home Office, (2021), Independent review of the Modern Slavery Act: final report [Online] Available from: https://www.gov.uk/government/publications/independent-review-of-the-modern-slavery-act-final-report [Accessed: 06/06/2025]
Suggested Action:	• Encourage sharing the policy through the use of the QCS App
Equality Impact Assessment:	QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.

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A-A Quality Care Ltd
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1. Purpose

1.1 To ensure that everyone at A-A Quality Care Ltd is aware of the Modern Slavery and Human Trafficking Policy and Procedure and the procedures in place to identify, respond appropriately and report in line with local and the national guidance. This policy refers to adults who may be at risk, the procedure for children is detailed in the Safeguarding Children and Child Protection Policy and Procedure.

1.2 This policy must be read alongside the Safeguarding Adults Policy and Procedure. A-A Quality Care Ltd will ensure that staff understand Reigate & Banstead Borough Council Local government safeguarding reporting procedures and that these procedures are communicated to all staff. Other policies that relate to Modern Slavery and Human Trafficking include but are not limited to the Raising Concerns, Freedom to Speak Up and Raising Concerns, Freedom to Speak Up and Whistleblowing Policy and Procedure, Safeguarding Children and Child Protection Policy and Procedure, the Recruitment Policy and Procedure, the Right to Work Checks Policy and Procedure and the Agency Staff Policy and Procedure.

1.3

Key Question	Quality Statements
SAFE	QSS3: Safeguarding
WELL-LED	QSW1: Shared direction and culture QSW2: Capable, compassionate and inclusive leaders
WELL-LED	QSW5: Governance, management and sustainability

1.4 Relevant Legislation

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

2. Scope

2.1 Roles Affected:

- All Staff
- Registered Manager
- Other management

2.2 People Affected:

- Service Users

2.3 Stakeholders Affected:

- Commissioners

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- Local Authority

3. Objectives

3.1 To promote awareness of concerns surrounding slavery and human trafficking and promote the commitment of A-A Quality Care Ltd in addressing slavery and human trafficking in all its forms. An annual statement will be produced, where applicable.

3.2 To ensure that identification, protection, care and support for victims of modern slavery and human trafficking is at the heart of our safeguarding procedures at A-A Quality Care Ltd.

4. Policy

4.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

4.2 A-A Quality Care Ltd has a zero-tolerance approach to modern slavery within the business and supply chains and we are committed to acting ethically and with integrity in all our dealings and relationships. We will implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in A-A Quality Care Ltd or within any third parties (agencies) that we are associated with.

4.3 All staff will be made aware of the issues surrounding slavery and human trafficking, whilst being encouraged and supported to report any concerns to A-A Quality Care Ltd management. A-A Quality Care Ltd will also support any staff that may be subject to slavery or human trafficking.

4.4 Where modern slavery or human trafficking is identified, A-A Quality Care Ltd will share information with the Reigate & Banstead Borough Council Local government Safeguarding Team to safeguard the individual from harm and with the objective of preventing future situations arising, to promote the elimination of routes and sources of slavery or human trafficking.

4.5 All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

4.6 All employees who suspect any members of the workplace being victim of modern slavery must notify their line manager.

4.7 A-A Quality Care Ltd will take steps to ensure that sufficient communication and employee awareness training is undertaken with regards to Modern Slavery.

4.8 All employees will be made aware of the Raising Concerns, Freedom to Speak Up and Raising Concerns, Freedom to Speak Up and Whistleblowing Policy and Procedure at A-A Quality Care Ltd. The purpose of this policy and associated procedure is to enable A-A Quality Care Ltd to thoroughly investigate allegations of any wrongdoing raised by employees within A-A Quality Care Ltd without fear of reprisal.

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4.9 A-A Quality Care Ltd 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).

5. Procedure

5.1 Reporting Modern Slavery and Human Trafficking Concerns

The following procedure must take place where there are any concerns that someone is a victim of modern slavery or human trafficking. A-A Quality Care Ltd must ensure that staff are aware that victims of modern slavery or trafficking will often not self-identify. Many will present with a different issue.

1) A concern is identified -This could be the Service User as a victim or perpetrator, or the Service User informs us of a concern they have.

2) If an individual is, or group of people are, in immediate risk of danger or harm, the police must be immediately notified on 999.

3) The staff member must discuss this with their line manager (where appropriate) and ROWENA ASAFO-AGYEI immediately.

4) ROWENA ASAFO-AGYEI contacts and escalates the concern immediately to Reigate & Banstead Borough Council Local government Safeguarding Adults Team.

5) A notification is made to the CQC via the provider portal.

5.2 Safer Recruitment

All staff engaged with providing services at A-A Quality Care Ltd will be subject to thorough and rigorous recruitment procedures that will include a DBS check, identity check, confirmation of validity to work in the UK, employment history, suitability for the role and references. This will minimise the chance of employing a person that has been, or is subject to, slavery or human trafficking. A-A Quality Care Ltd will follow the Right to Work Checks Policy and Procedure to ensure that a robust and fair process is followed at all times.

5.3 A-A Quality Care Ltd will only use staff provided by third-party organisations (such as agencies) that are either registered with the regulator or who can confirm that the staff being supplied are free to work in the UK and meet all the requirements for the role being provided for.

5.4 Training

All staff will undertake training on modern slavery and human trafficking. This will ensure that they are aware of the indicators of modern slavery which include:

- 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
- Clear exploitation of an individual by another for financial or sexual gain

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- Shows signs of physical or psychological abuse, looks malnourished or unkempt, anxious/agitated or appears withdrawn and neglected. They may have untreated injuries
- Rarely be allowed to travel on their own, seem under the control or influence of others, rarely interact or appear unfamiliar with their neighbourhood 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, e.g. 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

5.5 Staff will be advised that if they are subject to slavery or human trafficking, or if they are aware of any individual that may be subject to slavery or has been trafficked, or if slavery or human trafficking is disclosed to them they must inform the Registered Manager of A-A Quality Care Ltd or the police as soon as possible.

If a member of staff is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chain of A-A Quality Care Ltd constitutes any of the various forms of modern slavery, they should raise it with the Registered Manager of A-A Quality Care Ltd.

5.6 Modern Slavery Annual Reporting

The Government guidance states that under section 54 of the Modern Slavery Act 2015, certain businesses are required to publish an annual modern slavery statement setting out the steps they have taken to identify and address their modern slavery risks. It is essential that A-A Quality Care Ltd continues to identify and address the risks of modern slavery in operations and supply chains. As well as focusing on the health and safety of workers, A-A Quality Care Ltd will consider how fluctuations in demand and changes in the operating model may lead to new or increased risks of labour exploitation.

5.7 Recruitment Risks

Some suppliers may be seeking to recruit additional workers in order to meet increases in demand. A-A Quality Care Ltd will ensure that rigorous recruitment checks are maintained and that suppliers adhere to the same robust processes to ensure that vulnerable workers are not being exploited by third parties seeking to profit from heightened demand.

5.8 The Health and Safety of Workers

As a responsible organisation, it is important that the relevant local or national government policies are implemented throughout the supply chain at A-A Quality Care Ltd.

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5.9 Risk Assessment

A-A Quality Care Ltd will undertake a risk assessment of how suppliers are operating to highlight and help identify where there are risks of Modern Slavery or Human Trafficking occurring. A template available in the QCS Management system will be used where appropriate.

5.10 Review of Effectiveness

A-A Quality Care Ltd intends to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the supply chains of our providers. We will also continue to:

- Support our staff to understand and respond to modern slavery and human trafficking, and the impact that each and every individual working in Care can have in keeping present and potential future victims of modern slavery and human trafficking safe
- Gain assurance that all staff at A-A Quality Care Ltd have access to training on how to identify victims of modern slavery and human trafficking
- Review the Safeguarding Adults Policy and Procedure at A-A Quality Care Ltd to ensure that Modern Slavery and Human Trafficking are integral within the content and staff are directed to support and advice as needed

5.11 Indicators of Forced Labour

- 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

6. Definitions

6.1 Human Trafficking

- Human trafficking is defined as the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation

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- It is important not to confuse human trafficking with human smuggling. Human smuggling is also called people smuggling. Human smuggling occurs when an individual seeks the help of a facilitator to enter a country illegally, and the relationship between both parties ends once the transaction ends. Many of those who enter the UK illegally do so by this route. Human smuggling is not a form of modern slavery

6.2 Turnover

- "Turnover" means the amount derived from the provision of goods and services falling within the ordinary activities of the commercial organisation or subsidiary undertaking, after deduction of
  - Trade discounts
  - Value added tax
  - Any other taxes based on the amounts so derived (HM Government - 'Transparency in Suppy Chains')

6.3 Modern slavery

- 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
- A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators
- There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist

6.4 Exploitation (Modern Slavery and Human Trafficking)

- 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, radicalisation, forced marriage

6.5 Section 52 Modern Slavery Act

- This places a duty on Local Authorities to identify and refer modern slavery child victims and consenting adult victims through the National Referral Mechanism (NRM) This responsibility identifies a local authority as a First Responder. The Council as a first responder (FR) into the NRM process has a duty to notify the Home Office if anyone working within the council identifies a person with indicators suggesting they may be trafficked or enslaved

7. Key Facts - Professionals

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Professionals providing this service should be aware of the following:

- Where applicable, an annual statement on modern slavery and human trafficking will be published by A-A Quality Care Ltd on our website and approved by the senior management team e.g. the board of Directors and signed by a Director
- If there are cases of slavery or human trafficking then the service will share this information with Surrey County Council Contact Centre Room 296-298 County Hall Penrhyn Road Kingston Upon Thames KT1 2DN, Phone: 0300 200 1005 Email: contactcentre.adults@surreycc.gov.uk Textphone (via Text Relay): 18001 0300 200 1005 SMS: 07527 182 861 (for the deaf or hard of hearing) VRS: Sign Language Video Relay Service Fax: 020 8541 7390
- The Modern Slavery Act 2015 details what organisations need to do about slavery and human trafficking
- Staff will receive training on Modern Slavery Human Trafficking, and be supported by A-A Quality Care Ltd if subject to, or reporting of, cases of slavery or human trafficking
- Only staff that have been through robust recruitment procedures will be employed at A-A Quality Care Ltd
- If slavery or human trafficking is disclosed to you then this must be shared with the Registered Manager or the police if someone is in immediate danger

8. Key Facts - People Affected by The Service

People affected by this service should be aware of the following:

- If you are aware of or become part of any acts of modern slavery or human trafficking, this can be reported to A-A Quality Care Ltd and the necessary support will be provided
- You will receive Care from staff who have been through robust recruitment procedures

Further Reading

Elearning for Healthcare - Identifying and Supporting Victims of Modern Slavery:

https://www.e-lfh.org.uk/programmes/modern-slavery/

Recommended Content for a Modern Slavery Statement:

https://corporate-responsibility.org/wp-content/uploads/2017/06/Core_RecommendedcontentFINAL-1.pdf

Home Office - Modern Slavery Awareness and Victim Identification Guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/655504/6.3920_HO_Modern_Slavery_Awareness_Booklet_web.pdf

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A-A Quality Care Ltd
Downloaded: 7 January 2026
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Unseen:

https://www.unseenuk.org/

Government Updates:

Modern Slavery (Amendment) Bill:

https://www.lexology.com/library/detail.aspx?g=712dc80b-4563-47c4-ba8e-386deaa88649

GOV.UK - Piloting Devolving Decision Making for Child Victims of Modern Slavery:

https://www.gov.uk/government/publications/piloting-devolving-decision-making-for-child-victims-of-modern-slavery

GOV.UK - Transparency in Supply Chains:

https://www.gov.uk/government/consultations/transparency-in-supply-chains

Outstanding Practice

To be "outstanding" in this policy area you could provide evidence that:

- Specific training is provided on slavery and human trafficking
- The publishing of a statement on slavery and human trafficking even if this is not a legal requirement
- A very high level of understanding and awareness demonstrated in all areas of the service
- A-A Quality Care Ltd shares its practice in this area with other organisations and is seen as a 'best practice resource'
- The wide understanding of the policy is enabled by proactive use of the QCS App
- A-A Quality Care Ltd regularly audits and conducts thorough due diligence on its supply chain

Forms

The following forms are included as part of this policy:

Title of form	When would the form be used?	Created by
Indicators of Modern Slavery and Human Trafficking - PE07	To raise awareness within the workforce	Adapted from 'Unseen' guidance

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Title of form	When would the form be used?	Created by
Writing a Modern Slavery Statement - Guidance - PE07	To assist with writing a Modern Slavery Statement	QCS
Modern Slavery Statement - PE07	When creating a new Modern Slavery Statement	QCS

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Indicators of Modern Slavery and Human Trafficking - PE07

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, the influence of others, rarely interact or appear unfamiliar with their neighbourhood 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

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 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, e.g. passports

Unusual Travel Times

- Be dropped off/collected for work regularly 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

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 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

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- 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 childcare, 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 over normal working hours
- The individual may not have access to their 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 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, pickpocketing 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. Commonly, 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

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- 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

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Writing a Modern Slavery Statement - Guidance - PE07

Who needs to publish a statement?

A commercial organisation is required to publish an annual statement if all the criteria below apply:

- It is a 'body corporate' or a partnership, wherever incorporated or formed
- It carries on a business, or part of a business, in the UK
- It supplies goods or services
- It has an annual turnover of £36 million or more

Organisations are responsible for determining whether the legislation applies to them. You may wish to seek legal advice to decide if your organisation needs to produce an annual statement.

If A-A Quality Care Ltd meets the criteria, the modern slavery statement 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
- Be approved by the board or directors and signed by a director. This assigns ownership to senior-level management and encourages their proactive involvement in tackling abusive practices in business operations

Companies that do not meet these basic requirements are breaking the law

- A-A Quality Care Ltd structure, business and supply chains
- Its policies in relation to slavery and human trafficking
- The due diligence processes of A-A Quality Care Ltd in relation to slavery and human trafficking in its business and supply chains
- The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps that A-A Quality Care Ltd has taken to assess and manage that risk
- Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate
- The training about slavery and human trafficking available to A-A Quality Care Ltd staff

The statement must be:

- Written in simple language
- Succinct, but cover all relevant points and link to relevant documents within A-A Quality Care Ltd
- In English, but may be provided in other languages that are relevant to the supply chain

What else must it include?

- The statement must include either a statement of the steps A-A Quality Care Ltd has taken during the financial year to ensure that slavery and human trafficking is not taking place (in any of its supply chains and in any of its own business), or that A-A Quality Care Ltd has taken no such steps
- The statement must be true, referring to actual steps undertaken or begun and must be built upon year after year to evolve and improve over time
- The statement needs to be published and any director signing the statement needs to be satisfied that the statement is true. This might include carrying out a full

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investigation

- Charities and educational institutions are captured by the obligation. If the turnover is £36m, goods or services are supplied, and it carries on business within the UK, it is irrelevant the purpose for which its profits are made. Both franchisors and franchisees may be captured if they meet the turnover thresholds
- The statement will be published on the website of A-A Quality Care Ltd and, where appropriate, linked through to any other relevant websites of A-A Quality Care Ltd
- It must be obvious on the home page or clearly accessible by a drop-down menu. Historical statements can also be retained online when the new statements are published, to allow comparisons to be made and monitoring of A-A Quality Care Ltd over time
- If a parent company meets the requirements, it must include in its statement the steps taken in relation to each of its subsidiaries if they form part of the parent company's supply chain or business (even if the subsidiaries themselves do not meet all the requirements)
- A subsidiary organisation that meets the thresholds in its own right must produce its own slavery and human trafficking statement. However, a parent company may produce one statement that the subsidiaries also use

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A-A Quality Care Ltd
4 Mistley Gardens Hookwood Horley Surrey RH6 0BD

Modern Slavery Statement - PE07

THIS STATEMENT IS A TEMPLATE AND MUST BE UPDATED TO REFLECT A-A Quality Care Ltd

This statement sets out the steps that A-A Quality Care Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. A-A Quality Care Ltd has a zero-tolerance approach to any form of modern slavery and human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chains.

[Insert what your organisation does e.g. provide homecare services to xxx number of people, with xx number of staff at xx number of locations. State if you work with any particular partners e.g. Local Authorities.]

A-A Quality Care Ltd implements 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 employee, 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 employees including agency workers. We have also developed and implemented policies and processes which are intended to extend these commitments through our supply chain.

Policies

We have several internal policies to ensure that we are conducting business ethically and transparently. These include:

• Human Rights policy and our Ethics Policy where we confirm that we will not tolerate or condone the abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected

• Whistleblowing Policy, aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated and appropriate remedial actions are taken and we will work closely with social care and health providers ensuring that our policies and procedures dovetail with local procedures and best practice

• A robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard

• Employee Code of Conduct consistent with any professional codes of conduct

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Direct Communication

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

Suppliers

[*Insert what you think are your risk levels and what you do to mitigate those risks*]

We conduct due diligence on all suppliers before allowing them to become a preferred supplier. We include an online search to ensure that particular organisations have never been convicted of offences relating to modern slavery and we include our modern slavery policy as part of our contract with all suppliers. Suppliers are required to confirm that no part of their business operations contradicts this policy. As part of our contract with suppliers, they confirm to us that:
They have taken steps to eradicate modern slavery within their business

They hold their 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 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

Our supply chains include procurement of staff, consumables, facilities maintenance, utilities and waste management [add further areas]. We have conducted a risk assessment and will ensure that we will take further steps to ensure that we support the eradication of modern slavery, that staff understand how to recognise modern slavery and the appropriate safeguarding reporting processes are followed should there be concerns within our supply chains, with customers or suppliers.

Performance indicators

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

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 that 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. A-A Quality Care Ltd will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and makes 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.

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Responsibility for this Statement

The ultimate responsibility for the prevention of modern slavery rests with the [*insert who at Senior Management level has responsibility]* for ensuring that this policy and its implementation complies with our legal and ethical obligations. Managers at all levels are responsible for ensuring that 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

We understand that modern slavery risk is not static, and will continue our approach to mitigating this risk. We will assess the risk via our internal auditing processes.

This statement is made according to section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement of A-A Quality Care Ltd for the financial year ending xxxx. [State who has approved] of A-A Quality Care Ltd has approved this statement.

Approval for this statement

This statement was approved by the [*State title*]

Date

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