

# Modern Slavery Protocol

## Introduction

The Modern Slavery Act 2015 received Royal Assent on 26<sup>th</sup> March 2015 and consolidated and replaced existing legislation into one single Act. Modern slavery includes the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage. The Act was introduced to ensure that perpetrators can receive suitable severe punishment and support and protection could be enhanced for victims.

Modern slavery may also be known or referred to as Anti-Slavery and Human Trafficking. Modern slavery may be hidden, or it could be in plain sight and taking place in local communities, businesses, high streets, out of town and semi/rural areas.

Radis do not tolerate slavery or human trafficking in any part of its business and are committed to ensuring that it does not take place within its supply chains.

## Purpose

Radis are not legally obliged to publish a Modern Slavery Statement. However, we conduct our business in line with the Human Rights Act 1998, and in support of anti-slavery and human trafficking, and will provide clarity to our employees, customers and all stakeholders on how we deal with this.

This protocol has been produced to raise awareness of what modern slavery is, how it can be identified and how it can be reported in conjunction with Safeguarding Adults (and Safeguarding Children if relevant).

## Existing Legislation

Each of Radis' branches/services will work within the relevant legislation noted in the Safeguarding Adults Policy and within:

- Crime and Disorder Act 1998
- Children Act 1989
- Immigration Act 2016
- Mental Capacity Act 2005 (and Mental Capacity (Amendment) Act 2019)

## Existing Policies

Radis has existing safeguarding policies that relate to, and should be read in conjunction with this protocol:

- Safeguarding Adults
- Safeguarding Children
- Mental Capacity Act

Other policies include:

- Complaints
- Confidentiality

- Data Protection
- Equality and Diversity
- Human Rights
- Recruitment and Employment
- Whistle Blowing

## Supply Chains

Through an ethical approach to procurement we take necessary steps to ensure our supply chain holds the same values, commitment and policies to prevent, detect and eradicate modern slavery within their own operations and the operations of suppliers and business partners.

## Employees

Radis ensures that:

- the identify of all new employees is thoroughly vetted and that relevant documents are provided that prove their identify and right to work in the UK
- all employees are paid above the national living wage
- safeguarding training is provided for all employees and renewed on a regular basis
- whistleblowing is promoted within all its branches/services

## Anti-Slavery Partnerships

Local authorities operate Anti-Slavery Partnerships and work with local key agencies to tackle modern slavery and share intelligence, expertise and work jointly in respect of cross-border cases, provide better support for those staff who work on the front line and better care for victims, all of which may help increase the number of prosecutions. Each local authority area may differ in the issues that they face with modern slavery and how they deal with it.

## Defining Modern Slavery

A person is considered to be in slavery if they are:

- forced to work based on mental or physical threat or abuse or actual abuse
- controlled by an 'employer' or considered to be 'owned' by them
- dehumanised, degraded or desensitised
- treated as a commodity or brought and sold as 'property'
- physically constrained or have restrictions place on their freedom

**Servitude** is similar to slavery whereby a person is obliged to provide a service or undertake work that has been forced or imposed on them; this means that they have not voluntarily offered themselves to do the work. This type of slavery has been found in various industries that include agriculture, hospitality and manufacturing.

**Human Trafficking** is when men, women and children are forced into exploitation through being moved which could be within their own locality/area or country or this could be international. Even if a person has not yet been exploited, they are still a victim of human trafficking if they have been moved for the purpose and intention of exploitation.

## Types of Modern Slavery

### Debt Bondage

Debt bondage may arise through different types and forms of exploitation already taking place. This could be in relation to victims not being able to pay accommodation or travel fees and having no control over their debt or no way to pay it back. The cost of the debt may be taken from their wages which in turn increases the debt and further debts are accumulated. A person may be forced to work to pay off the debt. It can also be used as a way to control a victim and keep them confined to slavery.

### Domestic Servitude

Victims are forced to work and live in households in unbearable conditions with little or no pay and may be ill-treated, humiliated and subjected to working exhausting hours. Forced marriage can also lead to domestic servitude.

### Forced Crime

This includes victims being forced into a variety of illegal activities, i.e., shop lifting, pick pocketing, growing cannabis, county lines exploitation. The Modern Slavery Act provides a defense for victims who have been forced into criminal activity.

### Forced Labour

Victims are made to work with little or no pay and may face physical and/or mental threats of violence and abuse. They may have their passports confiscated by the exploiters (if they are foreign nationals) and could be forced to live in horrendous conditions and be under constant physical and mental threat.

### Organ Harvesting

Victims are trafficked so that their internal organs, normally the kidneys or liver, can be harvested for transplant.

### Sexual Exploitation

Victims of sexual exploitation may be forced into prostitution, pornography or lap dancing and receive little or no pay. They are likely to be deprived of their freedom to go where they like and when they like. They may also be subject to physical and mental threats and violence.

Other forms of exploitation include:

- Forced Marriage
- Financial Exploitation

Refer to Radis' Safeguarding Adults Policy.

## Indicators of Modern Slavery

The following may be indicators of modern slavery:

### Physical Appearance

- Physical or psychological abuse
- Appear malnourished or unkempt
- Be anxious or get agitated easily
- Appear withdrawn and neglected
- Have untreated injuries

### Isolation

- Not allowed to travel on their own or rarely allowed to
- Appear to be under the control or influence of others
- Lack of interaction or appear unfamiliar with their locality or place of work
- Relationships which may appear unusual – i.e., an adult is far older than a young teenager

### Deprived Living Conditions

- Unclean accommodation or unheated
- Overcrowded or cramped living areas
- Living and working at the same accommodation

### Freedom or Movement Restricted

- Lack of personal possessions
- No identification paperwork
- Lack of personal hygiene and wearing the same clothes all of the time
- Clothing may be unsuitable for their work

### Travelling for Work

- Being collected or dropped off for work either very early or late at night on a regular basis
- Private transport or taxis being used to for children/families being collected or dropped off at unusual times and there is no justification as to why this may be taking place at unusual hours

### Reluctance to Ask for Help

- Appears frightened or hesitant to make conversation with strangers
- Avoids eye contact
- Another person answers for them
- Fearful of law enforcers
- Unable to trust others or does not know where to get help from
- Fearful of deportation
- Fearful of violence towards themselves, their children or other family members

This is not an exhaustive list of indicators. There are other indicators that cover labour exploitation, sexual exploitation, domestic servitude, criminal exploitation and child exploitation. These indicators can be found at: <https://www.modernslaveryhelpline.org/about/spot-the-signs>

## Reporting Modern Slavery

The **Safeguarding Adults Policy** reporting procedure must always be referred to in the first instance. Radis' Internal Safeguarding Form (Appendix 1) should be completed and held on file whereby it is suspected that a service user may be subject to modern slavery.

Branches/services should contact their local authority Adult Social Care safeguarding team for further advice and guidance on reporting suspected or actual incidents of modern slavery. Under Section 52 of the Act, local authorities are under a duty to notify the Home Office when they identify a potential victim of modern slavery.

In an emergency, or if in immediate danger, the Police should be contacted on 999. Non-emergency calls should be directed to 101.

Other reporting bodies and information can be obtained from:

### **Modern Slavery Helpline:**

Telephone: 0800 0121 700

Online Report: <https://www.modernslaveryhelpline.org/report>

Website: <https://www.modernslaveryhelpline.org/report>

Available: 24 hours a day, 7 days a week and is free from landlines and most mobile phones.

### **Bawso Helpline:**

Telephone: 0800 731 8147

Available: 24 hours a day, 7 days a week.

Bawso is a voluntary organisation in **Wales** providing specialist services to victims and BAME people affected or a risk of Domestic Abuse and all forms of violence, including modern slavery and human trafficking.

### **Crimestoppers:**

For providing anonymous information if you have concerns about crimes and slavery.

Telephone: 0800 555 111

Available: 24 hours a day, 7 days a week.

## Support for Victims

In addition to the above helplines, Raids' branches/services hold other local and national contact numbers of organisations that may be able to provide further support to victims of abuse (refer to Safeguarding Adults Policy).

## Review

This protocol will be reviewed in line with the Safeguarding Adults Policy.