



Human Resources

Modern Slavery and Human Trafficking Statement

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PURPOSE	4
SCOPE	4
STATEMENT	4
Introduction from Sarah Stock, Managing Director	4
Organisational structure and supply chains	5
Countries of operation and supply	5
Responsibility	5
Relevant policies	6
Due diligence	7
Awareness-raising programme	7
ENFORCEMENT OF THIS STATEMENT	7

Purpose

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Independence Matters Group has taken to ensure that slavery and human trafficking are not taking place within its supply chains or in any part of its business. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

Scope

This policy applies to Independence Matters Group.

Statement

Introduction from Sarah Stock, Managing Director

As part of the Health & Social Care Sector, Independence Matters Group recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking.

Modern slavery can take place in a wide range of employment sectors, including health and social care. People using health and social care services may also be victims of modern slavery or human trafficking. Health and social care organisations also have a role in identifying victims of modern slavery and human trafficking who come to them for care or support.

Modern slavery and human trafficking is incompatible with the values, beliefs and commitment of the Independence Matters Group; which include being caring and acting with integrity. We fully support the government's objective to eradicate modern slavery and human trafficking. We recognise the responsibility that we have as a large organisation that employs more than 1,000 staff.

We are not legally obliged to publish a statement on modern slavery and human trafficking under the Modern Slavery Act 2015. However, as an organisation partly funded by the Government we are legally required to operate in ways that are compatible with the Human Rights Act 1998. The rights under this Act include the right for people to be free from slavery and forced labour under Article 4.i. We also have a duty to report criminal activity. Publishing this statement – and taking the actions contained within it – helps us to fulfil these duties.

Organisational structure and supply chains

This statement covers the activities of the Independence Matters Group Head Office, based in Dereham and delivers care and support to vulnerable adults throughout Norfolk and parts of Suffolk.

Countries of operation and supply

The organisation operates in England.

Our supply chains include:

- Agency staff
- Contractors
- Cleaning products
- Raw food grade materials for manufacturing pet bedding
- Recycled newsprint paper
- Cotton and j-cloth waste products
- ICT Hardware
- Office furniture and equipment to support customers/clients
- PPE and uniforms
- Stationery and publications

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows;

- **Policies:** The People and Quality Director (Independence Matters) is responsible for ensuring all policies in relation to the Modern Slavery and Human Trafficking Policies within the Independence Matters Group are reviewed and implemented. All policies are subject to approval from the Senior Leadership Team across the Independence Matters Group.
- **Investigations:** In relation to known or suspected instances of slavery and human trafficking the People and Quality Director will initiate an investigation into the matter and appoint the relevant personnel to conduct the investigation. This may include external consultants.
- **Awareness:** The HR Business Partner is responsible for raising awareness of the Modern Slavery and Human Trafficking Statement throughout the management teams, who are responsible for cascading this awareness to the teams.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations;

- Whistleblowing Policy – Independence Matters Group whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. We encourage all workers, customers and business partners to report any concerns related to the direct activities, or the supply chains of the organisation including circumstances that may give rise to an enhanced risk of slavery or human trafficking. Any person who has concerns can call the Modern Slavery Helpline on 08000 121 700 to seek help, raise a suspicion or request advice and guidance. The link <https://www.modernslaveryhelpline.org/learn-more/frontline-professionals> provides information and advice for employees.
- Employee code of conduct - The organisation's code makes clear to employees the actions and behaviours expected of them when representing the organisation.
- Supplier code of conduct - The organisation purchases products in good faith from reputable suppliers. However, should a supplier be suspect of a concern relating to modern slavery or human trafficking this may lead to the termination of the business relationship.
- Recruitment/Agency Policy – Independence Matters Group uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers from that agency.
- Safeguarding Policy – The policy is written to incorporate the principle pieces of legislation and adopts robust safeguarding measures in collaboration with MASH (Multi-Agency Safeguarding Team). Policies and procedures governing Safeguarding comply with Care Quality Commission Regulations, The Care Act (2014) and ADSS Standards.

Due diligence

The risk of slavery and human trafficking within our organisation is substantially avoided due to our policies and procedures. By building long standing relationships with our suppliers we aim to mitigate risks.

Awareness-raising programme

Independence Matters Group has raised awareness of modern slavery issues by distributing the leaflet entitled '*Help for adult victims of modern slavery*' and the Home Office information booklet; '*Modern slavery awareness & victim identification guidance*' has been issued to each Manager instructing that they read it and discuss it with their teams.

The guidance booklet and leaflet explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what external help is available e.g. through the Modern Slavery Helpline.

The posters highlight the Modern Slavery Helpline and telephone number and has been placed in staff areas.

Enforcement of this Statement

We will evaluate the effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain by monitoring processes to identify any concerns. This statement will be reviewed annually.

Senior Leadership approval

This statement was approved on 05 August 2019 by the Independence Matters and Home Support Matters Senior Leadership team, who will review and update it annually.

Managing Director's signature:



Sarah Stock
Managing Director, Independence Matters Group

