St Vincent's Nursing Home

Magnificat anima mea Dominum

Modern slavery and human trafficking policy

St Vincent's
Nursing Home

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1. Policy Statement

This policy describes the values, principles and procedures that underpin St Vincent's Nursing Home's (SVNH) approach to any situation where it becomes aware of, or has evidence of, involvement or the risk of involvement, direct or indirect, in enterprises that subject people to conditions that meet current definitions of modern slavery, human trafficking and forced labour. It applies to this care service and all other organisations with which it has dealings.

It is written in line with the safeguarding duties of local authorities under the Care Act 2014 (and equivalent applicable devolved government laws) to ensure any vulnerable adult is not subject to abuse by being a victim of modern slavery or forced labour, nor to any form of human trafficking or, for example, being coerced into such as "county line" drug trafficking.

It is also written to reflect the aims of the Modern Slavery Act 2015 that sets out the responsibilities and duties of corporate businesses and charities to prevent and avoid any dealings with any network or organisation implicated in modern slavery or human trafficking and to alert the police and other responsible authorities if they come across it. SVNH understands that as its total annual turnover is not over £36 million it is not subject to the Act's annual reporting requirements.

Modern slavery includes, under its definition, forced and compulsory labour, human trafficking of children and adults and organised activities that involve people being coerced, controlled and exploited to carry out work to which they do not freely consent for the financial gain of their controllers.

2. People Using the Service

SVNH ensures no vulnerable young person or adult in our care is subject to any conditions that meet the Care Act (and similar) definitions of modern slavery. If the service has any suspicions, information or evidence that any of the people using its services are victims of, or at risk of, becoming victims of modern slavery, exploitation or forced labour, it will take immediate protective action by alerting the appropriate safeguarding authority or police and apply all safeguarding procedures that then follow.

3. Staff

SVNH does not employ staff under any conditions that might make us vulnerable to accusations or suspicions that we are employing people under conditions that would amount to modern slavery and exploitation as defined. All staff are subject to recruitment procedures that comply with both employment law and registration requirements with pay and conditions of employment that meet all statutory requirements.

If we have evidence that any of our employees are subject to exploitation and forced labour by third parties, we will exercise our duty of care to our employees by reporting our concerns as

whistleblowers to the police or local unit responsible for investigating modern slavery to decide on further investigation or action. We will not act or discriminate against the employee if they are meeting all the required employment conditions and had been recruited in line with the service's recruitment procedures.

4. Contractors and Suppliers

SVNH deals with several outside organisations as suppliers of goods and services. We recognise that these organisations might form part of a longer supply chain. We make all reasonable efforts to ensure that no link in the supply chain is producing goods and services made under conditions of modern slavery or which might involve human trafficking.

We expect all our contractors and suppliers to have a similar zero-tolerance and due diligence approach to modern slavery and human trafficking and only work with organisations that have robust anti-modern slavery policies that operate in other parts of their supply chain and who comply with the Modern Slavery Act 2015.

We explain in our replies to businesses who respond to tenders and adverts for goods and services that we will check if they employ people under conditions of modern slavery and if they do similar checks with other businesses in their supply chain. In doing so, we expect those businesses to have taken all reasonable efforts to exclude their suppliers from colluding with modern slavery practices.

All staff members, particularly those responsible for procuring goods and services, are expected to report any concerns about any issue or suspicion of modern slavery in any parts of their dealings at the earliest possible stage.

Anyone raising concerns about slavery or human trafficking that affects the care service will be protected by the service's whistleblowing policy.