

ADISHAM HOUSE

Modern Slavery and Human Trafficking Policy

Including Website Transparency Statement

Document owner	Registered Manager
Approved by	Provider / Responsible Individual
Effective date	September 2026
Review frequency	At least annually and following material legal, regulatory or organisational change
Next review	September 2027

Commitment • Prevention • Recognition • Safeguarding • Responsible recruitment

1. Purpose and commitment

Adisham House is committed to preventing modern slavery, human trafficking, forced or compulsory labour, servitude, labour exploitation and other forms of exploitation within our service, workforce and supply chains. We will treat concerns as safeguarding and potentially criminal matters, act promptly to protect people from harm, and work with appropriate statutory agencies.

This policy supports our wider safeguarding, recruitment, whistleblowing/speaking-up, equality, staff conduct, complaints, procurement, data protection and risk-management arrangements. It should be read alongside those documents.

2. Scope

This policy applies to all employees, bank and agency workers, volunteers, contractors, consultants, suppliers, recruitment agencies and any other person or organisation providing goods or services to or on behalf of Adisham House. It also applies to concerns affecting residents, visitors and people encountered through our work.

3. Legal and regulatory framework

The policy is informed by the Modern Slavery Act 2015, including the transparency-in-supply-chains requirements in section 54 where applicable; the Human Rights Act 1998 and the right to freedom from slavery and forced labour; safeguarding duties and the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, including requirements relating to safeguarding and fit and proper persons employed.

Current government guidance requires a commercial organisation carrying on business in the UK, supplying goods or services and having annual turnover of £36 million or more to publish an annual modern slavery statement. Where Adisham House does not meet that statutory threshold, we will nevertheless maintain this policy and may publish a voluntary transparency statement as good governance.

4. What modern slavery can include

- slavery, servitude and forced or compulsory labour;
- human trafficking for exploitation;
- labour exploitation, including coercion, threats, excessive control or withholding wages;
- debt bondage, including recruitment-related debts or unlawful fees that make a worker feel unable to leave;
- confiscation or control of passports, identity documents, bank cards or personal possessions;
- restrictions on movement, communication, accommodation or freedom to change employer;
- sexual exploitation, criminal exploitation or domestic servitude.

5. Particular risks in adult social care

Modern slavery can affect both people receiving care and people working in care. We recognise that risks may arise through unethical recruitment, sponsorship arrangements, recruitment intermediaries, agency labour, accommodation tied to employment, dependency on an employer for immigration status, and lower-visibility supply chains such as cleaning, catering, laundry, maintenance and facilities services.

International recruitment is not itself evidence of exploitation. Overseas workers must be treated fairly, lawfully and with the same dignity and employment protections as other workers.

6. Recruitment and employment controls

Adisham House will operate safe, fair and effective recruitment procedures. Where recruitment is carried out by an agency or other third party, management will obtain assurance that appropriate checks and ethical recruitment standards have been applied.

- Verify identity, right to work and required pre-employment information and checks.
- Check employment history, references and reasons for leaving previous relevant employment in line with our recruitment procedures.
- Never knowingly require a worker to pay prohibited recruitment fees or tolerate debt bondage, coercion or misleading recruitment practices.
- Ensure contractual terms, pay arrangements, deductions and working expectations are transparent and lawful.
- Do not retain workers' passports or identity documents except briefly where genuinely necessary for a lawful check, returning them promptly.
- Provide workers with accessible routes to raise concerns without fear of retaliation.
- Where overseas recruitment or sponsorship is used, monitor for signs of visa-related coercion, excessive working hours, improper deductions, tied accommodation concerns or threats linked to sponsorship.

7. Procurement and supply-chain due diligence

We will take a proportionate, risk-based approach to suppliers and contractors. Higher-risk arrangements may require enhanced checks before appointment and during the contract.

- Consider modern-slavery risk when selecting recruitment agencies, labour providers and contractors.
- Seek confirmation that suppliers comply with applicable employment, right-to-work, wage, health and safety and modern-slavery requirements.
- Where section 54 applies to a supplier, consider reviewing its published modern slavery statement.
- Include appropriate contractual expectations allowing concerns to be investigated and serious non-compliance to result in corrective action, suspension or termination.
- Escalate unexplained or concerning labour practices, unusually low pricing, opaque subcontracting or reluctance to provide workforce information.

8. Recognising possible indicators

- A person appears frightened, withdrawn, controlled or unable to speak freely.
- Someone else holds the person's identity documents, money, phone or bank card.
- The person reports recruitment debt, threats, withheld wages, excessive deductions or being unable to leave employment.
- Living or working conditions appear unsafe, overcrowded, degrading or controlled by an employer or intermediary.
- A worker is routinely required to work excessive hours, appears exhausted, or has little control over shifts or travel.
- Accounts of recruitment, pay, accommodation or employment terms are inconsistent with what was promised.

No single indicator proves modern slavery. Concerns should be considered sensitively and in context.

9. Reporting and responding to concerns

Any immediate danger or emergency should be reported to the police by calling 999. Non-emergency suspected crime may be reported through appropriate police channels. Staff must also report concerns promptly to the Registered Manager or senior person on duty and follow the Adisham House safeguarding procedure.

The person should be listened to privately where safe to do so. Staff must not confront a suspected exploiter, make promises about outcomes, conduct their own investigation, or take action that could increase risk to the person.

- Record factual observations and what the person has said, using their own words where practicable.
- Consider immediate safeguarding, healthcare, advocacy, interpreting and accommodation needs.
- Make or support appropriate safeguarding referrals and cooperate with statutory agencies.
- Where the National Referral Mechanism may be relevant, seek support from an appropriate First Responder organisation. Consent requirements differ for adults and children; staff should obtain specialist safeguarding advice.
- Preserve relevant evidence and information securely and share it only where lawful and necessary.

10. Protection for staff who raise concerns

Staff are encouraged to raise genuine concerns at the earliest opportunity. Concerns may also be raised under our whistleblowing/speaking-up arrangements. No worker should suffer retaliation for raising a concern in good faith or assisting a safeguarding response. Deliberately malicious allegations may be addressed under the appropriate staff procedure.

11. Residents and safeguarding

Where a resident may be a victim or at risk of exploitation, the resident's immediate safety, wishes, communication needs, mental capacity and rights will be considered. Decisions and information sharing will follow safeguarding, Mental Capacity Act and data protection requirements. Where another resident, visitor, worker or third party is suspected of exploitation, risk-management measures will be put in place without prejudicing any police or safeguarding investigation.

12. Training and awareness

Relevant staff will receive safeguarding training that enables them to recognise and respond to abuse and exploitation, including modern slavery indicators. Managers involved in recruitment, sponsorship, procurement or supervision will receive additional guidance appropriate to their responsibilities. Learning from incidents, audits and external guidance will be incorporated into training and supervision.

13. Governance, monitoring and review

The Registered Manager is responsible for implementation and for escalating significant concerns to the Provider/Responsible Individual. Modern-slavery risks will be considered through safeguarding governance, recruitment audits, supplier oversight, staff feedback and incident review.

- Review recruitment and agency arrangements for indicators of exploitation.
- Review any modern-slavery concerns, referrals, complaints or whistleblowing themes and actions taken.
- Review relevant higher-risk suppliers and contractual controls.
- Update the policy following material changes in legislation, statutory guidance, CQC expectations or service arrangements.

This policy will be reviewed at least annually.

14. Responsibilities

Role	Key responsibilities
Provider / Responsible Individual	Provide oversight, approve the policy/statement as appropriate, ensure adequate resources and review significant risks.
Registered Manager	Implement the policy, ensure reporting and safeguarding action, oversee recruitment and supplier controls, training and annual review.
Managers / recruiters	Apply ethical recruitment and due-diligence controls and respond promptly to warning signs.
All staff and workers	Remain alert to indicators, treat people with dignity, report concerns promptly and cooperate with safeguarding arrangements.
Suppliers / contractors	Meet contractual and legal requirements and cooperate with proportionate due diligence and investigations.

15. Related Adisham House documents

Safeguarding policy and procedures; Recruitment and Employee Support policy/procedures; Whistleblowing/Speaking Up arrangements; Complaints policy; Professional Conduct policy; Equality policies; Staff Development and Training policy; Data Protection policy and privacy notices; procurement/contractor arrangements; incident reporting and risk-management procedures.

16. Key external references

Modern Slavery Act 2015; Home Office/GOV.UK Transparency in Supply Chains guidance; CQC regulatory policy position on modern slavery and unethical international recruitment; CQC Regulation 19 guidance on fit and proper persons employed; Human Rights Act 1998.

External guidance should be checked at review because requirements and regulatory expectations can change.

Website Modern Slavery and Human Trafficking Statement

Suggested public-facing version

Adisham House is committed to acting ethically and with integrity and to protecting people from modern slavery, human trafficking, forced labour and exploitation. These practices are incompatible with our values and with the safe, respectful care and employment environment we aim to provide.

Our service and our people

We provide adult social care in England. We recognise that modern slavery can affect both people receiving care and people working within health and social care. We maintain safeguarding and recruitment procedures designed to identify abuse, protect people from harm and ensure that people working in our service are suitable for their roles.

Recruitment

We use fair and robust recruitment processes, including identity and right-to-work checks and the other pre-employment checks required for the role. We expect any recruitment agency or labour provider we use to operate lawfully and ethically. We do not tolerate recruitment debt, coercion, withholding of identity documents, unlawful deductions or threats connected with employment or immigration sponsorship.

Suppliers and contractors

We take a proportionate, risk-based approach to suppliers and contractors. We expect organisations working with us to comply with applicable laws and to take reasonable steps to prevent exploitation in their own operations and supply chains. Where concerns arise, we may seek further information, require corrective action or end an arrangement where appropriate.

Safeguarding and speaking up

Staff are trained to recognise and report safeguarding concerns. Anyone who suspects modern slavery or exploitation is expected to raise the concern promptly so that appropriate safeguarding and statutory referrals can be considered. We support staff who raise genuine concerns in good faith.

Review and accountability

Our Registered Manager oversees implementation of our modern slavery arrangements, supported by the Provider/Responsible Individual. We review this statement and the underlying policy at least annually and when there are material changes to law, guidance, risks or our operating arrangements.

If Adisham House becomes legally required to publish a statement under section 54 of the Modern Slavery Act 2015, the annual statement will be approved, signed and published in accordance with the applicable statutory requirements.

Last reviewed: September 2026 | Next review: September 2027

Document review and revision record

Version	Date	Summary of change	Approved by
1.0	September 2026	New policy and website transparency statement created.	Provider / Responsible Individual

Approval

Approved by	
Position	Provider / Responsible Individual
Signature	
Date	