

# Modern Slavery Policy

## Policy Statement

Illuminate Care Group is committed to ensuring that modern slavery, in all its forms, including human trafficking, forced labour, and exploitation, has no place within our organisation or our supply chains.

We uphold the highest ethical standards and are dedicated to transparency and integrity in all our operations.

## Purpose

The purpose of this policy is to outline the measures Illuminate Care Group takes to prevent modern slavery and human trafficking within its business and supply chains and to ensure compliance with the Modern Slavery Act 2015.

## Scope

This policy applies to:

- All employees, including permanent, temporary, and agency staff.
- Contractors, suppliers, and other stakeholders working with or on behalf of Illuminate Care Group.

And is associated with the following **UK Laws and Regulations**

- **Modern Slavery Act 2015 (UK)**

Requires organisations with an annual turnover of £36 million or more to publish an annual statement on steps taken to combat modern slavery in operations and supply chains.

Mandates transparency in supply chains and due diligence on labour practices.

- **Human Rights Act 1998 (UK)**

Protects the rights and freedoms of individuals in the UK, including protection from slavery, servitude, and forced labour.

- **Employment Rights Act 1996 (UK)**

Provides protection for workers, including fair treatment and against unfair practices like forced labour.

- **Equality Act 2010 (UK)**

Promotes equality and fairness, supporting ethical treatment of workers and prohibiting discriminatory practices that can lead to exploitation.

- **Transparency in Supply Chains Regulations 2015**

Supplementary to the Modern Slavery Act, requiring businesses to disclose measures taken to identify and prevent modern slavery.

- **Immigration Act 2016**

Includes measures to combat illegal working and exploitation of migrant workers, reinforcing anti-slavery principles.

## Care Sector-Specific Regulations

1. **Safeguarding Adults and Children Guidelines**

Safeguarding regulations stress the importance of protecting vulnerable individuals from exploitation and abuse, including modern slavery.

2. **Working Time Regulations 1998 (UK)**

Ensures fair working hours, addressing potential risks of forced labour through excessive or exploitative working practices.

3. **Health and Safety at Work Act 1974 (UK)**

Promotes a safe and fair working environment, reducing risks of exploitation.

## Residential Care for Children

1. **Children's Homes (England) Regulations 2015** (Including Quality Standards)

- Covers the operation of children's homes, focusing on care, safety, and well-being of residents.
- Quality standards include:
  - The **Care Planning Standard**: Ensuring individualised care plans.
  - The **Protection Standard**: Protecting children from harm, including modern slavery.
  - The **Leadership and Management Standard**: Effective oversight of the home.
- Regulated by **Ofsted**, which inspects children's homes regularly.

## 2. Children Act 1989 and 2004

- The foundation of child protection law in the UK, outlining duties to safeguard children and promote their welfare.
- Emphasises the importance of avoiding harm and exploitation in care settings.

## 3. The Care Standards Act 2000

- Establishes the regulation and inspection of residential care settings.
- Includes staffing, care quality, and premises safety requirements.

## 4. Working Together to Safeguard Children (2018)

- Provides statutory guidance for all organisations working with children to ensure effective safeguarding practices.
- Emphasises multi-agency collaboration to protect children.

## Supported Accommodation for 16-18-Year-Olds

### 1. Care Planning, Placement, and Case Review Regulations 2010

- Outlines the responsibilities of local authorities when placing young people in supported accommodation.
- Ensures placements meet the needs of young people transitioning to independence.

### 2. Children (Leaving Care) Act 2000

- Ensures proper support for care leavers, including accommodation that is safe and suitable for 16-18-year-olds.

### 3. Children and Families Act 2014

- Focuses on support for vulnerable young people, including those with special educational needs (SEN), ensuring their accommodations are appropriate.

### 4. Standards for Supported Accommodation

- Introduced by the Department for Education, sets standards for accommodation, staffing, and safeguarding for 16-17-year-olds in supported settings.

5. **Housing Act 1996 (Part VII)**

- Ensures that young people in supported accommodation have access to safe and secure housing arrangements.

6. **Ofsted Inspections for Semi-Independent Accommodation**

- While not regulated like children's homes, new Ofsted frameworks are being introduced to assess quality standards and safeguarding measures.

## **Independent Schools**

1. **The Independent School Standards Regulations 2014**

- Sets out requirements for the quality of education, welfare, health, and safety of pupils, as well as premises standards and leadership.

2. **Education Act 2002 (Section 157)**

- Requires independent schools to ensure the safety and well-being of students, covering safeguarding, bullying prevention, and anti-discrimination measures.

3. **Keeping Children Safe in Education (KCSIE) 2024**

- Statutory guidance for schools, ensuring that all staff understand their duties to safeguard and protect children from harm, including risks of modern slavery.

4. **The Equality Act 2010**

- Ensures equal treatment of students, including reasonable adjustments for SEN or disabilities.

5. **The Children and Families Act 2014**

- Focuses on SEN provision, requiring schools to have tailored approaches for children with special needs.

## Shared Frameworks Across All Sectors

1. **The Safeguarding Vulnerable Groups Act 2006**
  - Ensures that individuals working with children and young people are appropriately vetted.
2. **Working Together to Safeguard Children (2018)**
  - Multi-agency safeguarding framework that applies to all children's services, including education and care settings.
3. **Health and Safety at Work Act 1974**
  - Mandates safe premises and practices across care and education settings.
4. **Data Protection Act 2018 (GDPR)**
  - Ensures the secure handling of personal and sensitive information in all settings.
5. **The Human Rights Act 1998**
  - Safeguards the rights of children and young people to be treated with dignity, respect, and fairness.

## **Our Commitment**

### **1. Governance and Accountability**

- Responsibility for ensuring compliance with this policy lies with the Senior Management Team.
- Illuminate Care Group ensures that all staff members understand their responsibilities regarding the identification and prevention of modern slavery.

### **2. Risk Assessments**

- We undertake risk assessments of our business operations and supply chains to identify areas where the risk of modern slavery is most significant.

### **3. Due Diligence**

- Illuminate Care Group conducts due diligence when engaging with suppliers, contractors, and business partners to ensure they share our values and ethical standards.

### **4. Policies and Procedures**

- Illuminate Care Group has robust recruitment processes, including rigorous checks on eligibility to work, to safeguard against forced or trafficked labour.
- We require all suppliers and contractors to adhere to our Supplier Code of Conduct, which includes a commitment to ethical labour practices.

### **5. Training**

- All staff members receive training on modern slavery awareness and how to identify potential signs of exploitation.

### **6. Reporting Concerns**

- Illuminate Care Group encourages staff and partners to report any concerns related to modern slavery. Concerns can be raised confidentially through our Whistleblowing Policy.

## Supporting Vulnerable People in Our Care: Modern Slavery Prevention

Illuminate Care Group is deeply committed to protecting vulnerable individuals in our care from exploitation, including risks associated with modern slavery, human trafficking, and forced labour.

We implement proactive measures to safeguard those who may be at increased risk due to their circumstances or vulnerabilities.

### 1. Awareness and Education

- **Staff Training:**

All staff members are trained to recognise the signs of modern slavery and human trafficking. This includes understanding indicators such as physical or emotional distress, restricted movement, financial control, or lack of personal identification documents.

- Training is refreshed annually and includes case studies relevant to care and education settings.

- **Raising Awareness with Young People:**

We educate individuals in our care about their rights, personal safety, and how to seek help if they feel at risk. This includes workshops / key working sessions on:

- Understanding exploitation.
- Recognising coercive or controlling behaviour.
- Knowing how and where to report concerns.

### 2. Safeguarding Practices

- **Individualised Risk Assessments:**

Each vulnerable person in our care is assessed for risks of exploitation, including modern slavery, with tailored interventions to mitigate those risks.

- **Safe Reporting Mechanisms:**

Vulnerable individuals are encouraged to voice concerns about their safety. We provide accessible and confidential channels for reporting exploitation, including direct access to trusted staff, local safeguarding teams, and independent advocacy services.

- **Partnership with Authorities:**

We work with local safeguarding boards, the police, and anti-slavery organisations to ensure immediate action if concerns of modern slavery arise.

### 3. Empowering Vulnerable Individuals

- **Promoting Independence:**

For young people in supported accommodation, we focus on life skills, such as personal finance management, understanding employment rights, and navigating safe work opportunities, to reduce their vulnerability to exploitation.

- **Access to Advocacy Services:**

Vulnerable individuals have access to independent advocates who can help them voice concerns, access legal support, and understand their rights.

- **Trauma-Informed Care:**

Our staff are trained in trauma-informed practices to support individuals who may have experienced or are at risk of modern slavery. By creating a secure and nurturing environment, we help rebuild trust and resilience.

### 4. Monitoring and Accountability

- **Ongoing Supervision and Audits:**

Regular reviews of care practices, supply chain processes, and staff recruitment ensure that modern slavery risks are mitigated both within the organisation and externally.

- **Incident Reporting and Action:**

Any suspicion or evidence of exploitation is reported immediately through our safeguarding procedures, in line with statutory requirements. Illuminate Care Group is committed to taking swift action, including liaising with law enforcement and providing full support to affected individuals.

### 5. Collaboration with Anti-Slavery Organisations

- **Partnerships:**

Illuminate Care Group collaborates with organisations like the National Referral Mechanism (NRM) and the Modern Slavery Helpline to ensure robust protection and support for individuals affected by exploitation.

- **Resources and Referrals:**

We provide access to specialised resources, including safe housing options, legal aid, and counselling services, for those who may be impacted by modern slavery.

## Supply Chain

We are committed to working with suppliers who uphold the same standards. Illuminate Care Group actively works to identify and address risks within our supply chains by:

- Conducting regular audits and reviews of suppliers.
- Requiring suppliers to confirm adherence to anti-slavery principles.

## Monitoring and Review

This policy is reviewed annually to ensure its effectiveness and to reflect changes in legislation, organisational practices, and our ongoing commitment to combat modern slavery.

## Policy Breaches

Any breach of this policy by employees, suppliers, or contractors will be investigated thoroughly and may lead to termination of contracts, disciplinary action, or legal consequences.

## Approval and Review

Approved by: Senior Management Team

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Reviewed no update needed

