

# Slavery and Human Trafficking Statement and Policy

## Purpose of this statement

This statement sets out what steps and preventative measures the company has taken to ensure modern slavery and human trafficking is not taking place in our businesses or supply chains.

For the avoidance of doubt the term NCG throughout the policy refers to National Care Group and all constituent companies managed under the NCG operational management structure.

## The organisational structure

Through its network of locally managed organisations, National Care Group (NCG) supports over 1100 individuals with complex support needs including mental health, learning disability and acquired brain injury in both residential care and supported living services across England and Wales

NCG is committed to ensuring that quality and good governance is at the heart of everything we do and that a positive culture across all the organisations operated within the group is embedded

## Supply Chains

NCG source the provision of goods and services (which include business support and the supply of labour) from reputable organisations that share our values

We are passionate about ensuring that our supply chains are free from any taint of slavery or human trafficking

## Policies

We have a number of policies to protect from any taint of slavery or human trafficking including:

- Duty of Care and Code of Conduct
- Recruitment and Referencing
- Anti-Bribery and Corruption
- Whistleblowing
- Disciplinary
- Equal Opportunities, Equality & Diversity
- Conflicts of Interest
- Disclosure and Barring Service (DBS)

All policies are reviewed annually which evidences our commitment to ensure slavery and human trafficking is not taking place within our organisation or supply chains.

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HR006	003	December 2020	April 2021	Poeple Director

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### Training

NCG recognise that given we support individuals with a range of additional needs they are all potentially vulnerable and may be more susceptible to exploitation and abuse. NCG ensured all colleagues are trained in safeguarding and are vigilant in raising any issues, with internal functions and external safeguarding agencies. The organisation also uses an external whistleblowing hotline to encourage and give employees the opportunity to raise any concerns anonymously.

### Recruitment

As an equal opportunities' employer, NCG's recruitment and people management processes are designed to ensure that all prospective employees and workers are legally able to work in the United Kingdom. The organisation is also committed to ensuring that the onboarding process is robust to safeguard employees or workers from any abuse or coercion.

In relation to our workforce we have a robust DBS check procedure which is reconducted every three years, as well as an in-depth referencing process to ensure safe recruitment. When using an agency to provide staff, we ensure we build relationships with reputable companies and follow a vetting process to ensure they align with the organisations core values.

### Due Diligence

As part of our Due Diligence process we look to evidence how our suppliers seek to comply with this legislation and work closely with the Quality Director to identify areas of risk and put mitigations in place where necessary.

The organisation works to create partnerships with our suppliers to build trust and confidence so that our suppliers understand our values, business structure and procedures.

### Management Responsibility

The organisation ensures that the senior management team have been briefed in respect to this legislation and our organisational responsibility and commitment.

### Recognising our Effectiveness

NCG understand it is not always easy to identify potential victims however we have put the following in place to protect our colleagues and the individuals to protect from exploitation:

- Good working practices
- High standards of quality
- Health and safety training
- Working time directive
- Pay above National Minimum Wage
- Safe rostering processes

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**The organisation commits to:**

- continue to undertake regular reviews of our procurement and due diligence processes
- implement systems to identify areas of concern in relation to potential breaches of legislation
- have a transparent and open culture
- continue to build long standing partnerships with our supply chain
- conduct regular reviews of processes

**Effective action taken to address modern slavery:**

No instances of modern slavery were identified during 2019

**This statement is signed by the People Director and is our group statement for the current financial year 2020-2021**

**Name:** Jo Brewin

**Signed:**



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