

## Modern Slavery and Human Trafficking Statement

This statement sets out Somerset Care's actions to understand all potential modern slavery risks related to our business and the steps it has taken to ensure that modern slavery and human trafficking is not taking place in any part of the service, or in our supply chain. This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022.

### Somerset Care's Structure

Somerset Care is an award winning not-for-profit care provider situated in the South West of England. Somerset Care has 26 residential and nursing care homes across Somerset and the Isle of Wight, with a community care service providing circa 8,000 weekly hours of support to people in their own homes every week across Somerset, Wiltshire, Bath and North East Somerset, and Devon.

Somerset Care also has a '*Petals*' dementia service, an award winning '*Realise*' service providing support for individuals with learning disabilities, a '*My Willows*' lifestyle homecare service, and a facilities management company (Acacia Facilities Management Limited).

In September 2021 Somerset Care purchased Way Ahead Community Services Limited (WACSL) and its parent company Way Ahead Holdings Limited. WACSL provides circa 4,000 hours of day care at home for the elderly and is a good fit for our existing Community business.

### Our Supply Chain

Somerset Care sources a wide range of products and services from hundreds of local and national suppliers. Our supply chain spans a variety of industry sectors, which can be broadly grouped as follows:

- Capital Construction and Property;
- Maintenance & Facilities Management;
- Professional Services;
- IT and Supplies;
- Medical & Clinical Supplies;
- Other Supplies and Services;
- Other Service Contracts (including statutory services, utilities, rent etc.).

### Our Commitment to preventing modern slavery and human trafficking

We are committed to ensure that no forms of modern slavery or human trafficking occur in any part of our business or supply chains.

We are committed to complying with all laws and regulations as well as conducting interactions with our supply chain in a fair, transparent and professional manner at all

times. We play an active role in provider development and will clearly communicate our expectations to contracted suppliers.

We expect all companies who supply us to be compliant with all applicable laws relating to slavery and human trafficking, to undertake their own due diligence on their supply chains and business partners, and to ensure that any contracts with their sub-contractors have similar obligations.

## Policies and Controls

The Somerset Care Group has a framework of policies, procedures, and contractual requirements in place which contribute towards the prevention of slavery and human trafficking within our organisation or supply chains.

These include, but are not limited to, areas such as property management, risk management, safeguarding, health and safety, recruitment, whistleblowing, procurement, terms and conditions and codes of conduct for staff, suppliers and contractors, as well as due diligence and checks when recruiting staff or engaging suppliers or contractors. In particular we:

- Follow clearly defined recruitment procedures, and highlight systems in place to encourage all staff to report concerns internally (with the protection of the Company Policies covering confidential reporting and whistleblowing);
- Ensure modern slavery and other forms of abuse are covered within our Safeguarding Policy and associated documents. This document reflects our commitment to avoiding abuse and ensures our customers and employees are protected;
- Provide staff with mandatory training during induction (with periodic refresher training) which highlights the importance of raising any concerns and what to do if any suspicions are raised, as well as how staff can act to support individuals both within and outside of our service;
- Have clearly defined staff disciplinary procedures to ensure staff expectations are met, with all incidents of staff misconduct investigated in the appropriate manner;
- Build longstanding relationships with external suppliers, where possible, to ensure commitment and make clear our expectations of business behaviour;
- Engage external providers and suppliers which have their own policies and procedures aimed at preventing modern slavery and human trafficking.

In the coming year we will continue to focus on training and promoting awareness of this statement to our staff and testing the strength of the controls in place within our supply chain.

## Upholding our Values

Somerset Care follows the values of embracing change, doing the right thing, making a difference, and connecting with people. We have zero-tolerance to any forms of slavery or human trafficking and expect our suppliers, providers, and all of our staff to adhere to our values at all times. We review policies, procedures or requirements as required ensuring there is no slavery or human trafficking taking place in our group or in our supply chains.

The Executive Team are responsible for ensuring compliance with these requirements.

## Measuring the effectiveness of our policies

Somerset Care uses the following methods to assess the effectiveness of our policies:

- In house audits of our homes and community services by a dedicated Quality and Performance Team;
- Self-assessment work-books to ensure expectations are being met and that our customers are receiving a safe and effective service;
- Work-force monitoring by Managers and effective payroll systems;
- Staff and customer feedback questionnaires;
- Regular communication and contact between all parts of our service, as well as external suppliers to ensure our expectations are met.

As a registered care provider, Somerset Care receives periodic external inspections from the Care Quality Commission (CQC). These inspections are often unannounced and rate our services based on five performance indicators; safe, effective, caring, responsive, and well-led.

## What we've achieved in 2021/22

Implemented a neutral vendor model to gain better visibility and monitor compliance of recruitment agencies used on our agency panel. Compliance checks are audited by the neutral vendor, which adds another layer of protection against potential modern slavery.

We have begun reviewing the relevant policies to prevent Modern Slavery within our company.

We have introduced 'Speak Up Champions' that will act as a further avenue for people to raise concerns and escalate issues, including any concerns with regards to modern slavery.

We have provided opportunities for staff to raise issues through 121s with managers and through relevant surveys.

We monitor our key suppliers' compliance with the Modern Slavery Act (MSA) through our due diligence processes which reviews their Modern Slavery declarations to ensure they have a policy in place and are compliant.

As part of our Payroll verification checks we search for any payments made to different employees using the same bank account details in order to identify any potential fraud or involvement of a gang master. If any are discovered we investigate thoroughly and if the involvement of a gang master is suspected we report to the relevant authorities.

### What we plan to achieve in 2022/23

Our intention in 2022/23 is to train staff and raise awareness of modern slavery by developing an e-learning programme that delivers some key messages on this topic.

This training will explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties in the company; and
- what external help is available, for example through the Modern Slavery Helpline.

We will raise awareness of this statement to all colleagues using our intranet, cascades and other forms of communications.

We will continue to monitor our key suppliers' compliance with the Modern Slavery Act.

### Board approval

This statement was approved by the Organisation's Board who review and update it annually. It is available to view on Somerset Care's website.

**Gary Ridewood**  
Chief Executive Officer  
September 2022