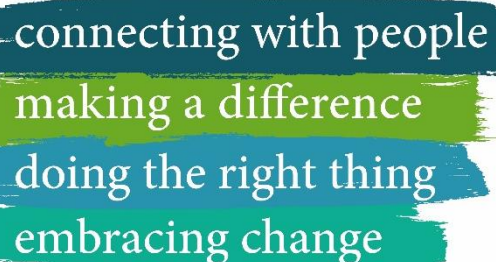


Modern Slavery Policy

The Somerset Care Group is committed to eradicating modern slavery, human trafficking, forced labour, and any form of exploitation from our operations and supply chains, and outlines our commitment to preventing these heinous practices and outlines the steps we take to ensure compliance, transparency, and ethical conduct.

This policy has been designed to ensure that all employees of the Somerset Care Group understand our approach, their responsibilities and how concerns can be raised.



connecting with people
making a difference
doing the right thing
embracing change

We support people
to live the life **they** choose.



connecting with people

- I make sure I bring a positive attitude to work
- I respect confidentiality
- I help others so we work as a team
- I am flexible
- I am warm and welcoming
- I protect the dignity of others
- I help people to feel safe
- I build trusting relationships with others

making a difference

- I say thank you to people for their help
- I celebrate success with others
- I give feedback to others
- I welcome feedback from others
- I am kind and caring
- I support others to have the best day they can

doing the right thing

- I listen, and then I listen some more
- I speak up when things aren't right
- I admit to mistakes, and I learn from my experience
- I never walk past something that I'm not happy with
- I respect people's views
- I ensure people's views are heard

embracing change

- I am open to new ideas
- I try to do things better
- I welcome change
- I share my views and ideas
- I recognise when I need to improve
- I think creatively

Policy Statement

The Somerset Care Group comprises Somerset Care Ltd and its subsidiaries. The Somerset Care Group is committed to eradicating modern slavery, human trafficking, forced labour, and any form of exploitation from our operations and supply chains. This policy sets out our responsibilities and of those working for and on our behalf to prevent these heinous practices and outlines the steps we take to ensure compliance, transparency, and ethical conduct in our business and throughout our supply chains.

This Policy applies to all persons and organisations working for us or on our behalf in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.

The definition of Modern Slavery:

Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery' – criminal activity that deprives victims of their liberty and usually involves financial and other exploitation.

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.

Our Commitment

The Somerset Care Group is committed to ensuring we do not use use forced, bonded or involuntary labour, and workers are not required to lodge 'deposits' or identity papers with the Group and can leave after giving reasonable notice, with all wages owed to be paid.

The Somerset Care Group manages their Overseas Sponsorship Licence appropriately in accordance with the requirements of the Home Office and immigration legislation.

The Somerset Care Group expects everyone working with us, or on our behalf to support, and uphold the following measures to safeguard against modern slavery:

- We undertake appropriate due diligence on all suppliers and provide assurance that their policies, processes, controls, and monitoring are robust and that they are committed to the principles of the Modern Slavery Act 2015.
- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- We commit to the prevention, detection and reporting of modern slavery in any part of our organisation or supply chain. This is the responsibility of all those working for us or on our behalf.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

- We take a risk-based approach to our contracting processes and keep them under review.

Consistent with our risk-based approach we require:

- Appropriate due diligence to be undertaken regarding employment and recruitment agencies we contract with, and any other third parties supplying workers to our organisation.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the principles of the Modern Slavery Act 2015.
- Regular compliance assurance from the third party; where necessary we will consider whether circumstances warrant us carrying out additional compliance audits.

If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from, considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach, through to terminating such relationships and agreements if necessary.

Reporting Concerns

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. If you believe or suspect that a breach of this policy has occurred, then you should notify your manager or report it in accordance with our Whistleblowing Policy. All concerns raised will be taken seriously and conducted by an impartial member of staff. If it is appropriate, Somerset Care will investigate the concern with any third parties, supply chain organisations, or external organisations.

All concerns raised will be documented, the investigation and findings recorded, as well as any necessary action taken. Where appropriate, continued monitoring will take place. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form it is.

Roles and Responsibilities

Board Members and Chief Executive Officer:

The Board has overall responsibility for the policy. The Chief Executive as accountable officer has overall responsibility for monitoring and implementing the policy and its guidance and reporting to the Board.

Managers are responsible for:

- Ensuring that all colleagues new and existing, are familiar with and have access to this policy.
- Ensuring that all staff complete the required mandatory training.
- Ensure all staff and key contacts are aware of Somerset Care's Values, especially those working with our supply chain businesses, for example the supply of temporary workers.
- Supporting with any auditing processes internally or externally in connection with this policy.
- Ensuring that concerns raised are taken seriously and raised to the HR Team without delay and managed in a confidential and sensitive manner.

Head of HR is responsible with their team for:

- Advising managers and individuals on the application of the policy and the Whistleblowing Policy.
- As appropriate, Identifying and supporting a suitably trained and competent investigating officer to carry out the investigation, and a supporting subject matter expert if required.
- Monitoring the application and effectiveness of the policy.
- Keeping records, monitoring cases, and presenting data on the number and nature of disclosures made, actions taken, and lessons learnt, and reporting this information to the Board.

All Staff are responsible for:

- Compliance with this policy and any linked policies, to ensure Somerset Care remains free from modern slavery practices.
- Prompt and timely reporting of any concerns to their line manager in accordance with the Whistleblowing Policy, at the earliest point of notification or awareness.
- Undertaking all mandatory training and proactively engage with any additional training provided.

Training

Training on this policy and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Additional Support

Support is available through your line manager, Senior Management, and by the HR Team. Support is also available by accessing the Employee Assistance Programme through the freephone telephone helpline by dialling **0800 328 1437**, open 24 hours per day, 7 days per week. Online support is available by visiting www.employeeassistance.org.uk using the login code **somerset**

Additional support is available from the Modern Slavery Helpline by telephoning 08000 121 700.

Measuring and Monitoring our Effectiveness

We consider on an annual basis, the effectiveness of our internal policies which support our commitment to eradicating Modern Slavery and the measures we have taken to comply with the Act; where necessary, we will adapt our practices as required.

The following methods are used to assess the effectiveness of our policies:

- In house audits of our services by a dedicated Quality and Performance Team;
- Work-force monitoring by Managers, support teams and effective payroll systems;
- Staff and customer feedback questionnaires;
- Regular communication and contact between all parts of our services, as well as external suppliers to ensure our expectations are met.

As a registered care provider, the Somerset Care Group receives periodic external inspections from the Care Quality Commission (CQC) who rate our services, which are often unannounced.

Related Documents

SC-COR GOV-4 Whistleblowing Policy (Raising Concerns) Policy V1