

## Modern Slavery and Human Trafficking Statement

This statement highlights the key activities the Somerset Care Group has taken 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.

### The Somerset Care Group Structure

The Somerset Care Group is an award winning not-for-profit care provider situated in the South West of England. The Somerset Care Group comprises Somerset Care Limited and five subsidiary companies. Somerset Care has 22 residential and nursing care homes across Somerset and Devon, with community and specialist services providing care and support to people in their own homes across Somerset, Wiltshire, Bath and North East Somerset, and Devon. Our specialist services include '*Petals*' dementia service, our Learning Disabilities arm 'Realise South West', and The Halcon Centre, our outstanding physical disabilities service.

The people we support are funded by local authorities, and other health and social care organisations, as well as directly by the individuals we support themselves.

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

The Somerset Care Group is committed to the principles of the Modern Slavery Act 2015 and recognise the scale and seriousness of the problem of modern slavery and human trafficking, and most importantly of the impact on its victims.

We employ over 2,000 people, some of whom are originally from outside of the UK. Employment of people from overseas potentially represents the biggest risk of modern slavery to our organisation, along with the use of temporary agency staffing. We are an equal opportunities employer, fully committed to creating a safe working environment for all our staff, where they feel confident to report any concerns.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We have robust policies and recruitment procedures in place to prevent modern slavery and comply with our employers' obligations in the management of our Sponsorship Licence, but recognise vigilance is required as the risk cannot be eradicated entirely.

This statement sets out the steps we have taken during the financial year ending 31st March 2024 in our continuing commitment to tackle modern slavery in our organisation and supply chains.

### Training and Awareness

We ensure that all new starters receive our Modern Slavery Policy and other relevant policies and continue to raise awareness of modern slavery to colleagues by sharing relevant

information through our internal communication channels. Operational Heads of Departments are qualified in Level 3 Safeguarding which includes Modern Slavery, and E-learning has been introduced on our internal learning portal for all colleagues.

Our policy explains how to report any suspected cases of modern slavery to Somerset Care and includes the contact telephone number of the Modern Slavery Helpline; we continue to encourage suggestions from our employees for any additional measures we can put in place to further reduce the risk of modern slavery.

## **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 both Modern Slavery and Whistleblowing Policies.

Others include, but are not limited to, areas such as property management, risk management, safeguarding, health and safety, recruitment, Whistleblowing, procurement, as well as due diligence checks for engaging suppliers and 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 also 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 all staff mandatory training about Modern Slavery, and Whistleblowing (with periodic refresher training) which highlight 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.
- Provide additional training to managers which expand their knowledge further and highlight their responsibilities as a manager.
- Have in place both Modern Slavery, and Whistleblowing policies to clearly explain the importance of raising such concerns, and our processes.
- Have in place an external Confidential and anonymous reporting line which can be accessed by telephone, or online, and which is available 24 hours per day, 7 days per week.
- 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.

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.

## Recruitment Processes

Following the end of free movement between mainland Europe and the UK in 2021, due to more restrictive immigration systems, there is an increased risk of exploitation of migrant workers.

Nationwide recruitment challenges continue to impact upon the care sector, and we continue to work with a range of approved recruitment agencies. These agencies are already subject to comprehensive due diligence checks and are required to sign up to our specific recruitment agency terms and conditions to ensure that the robust recruitment and identity checks we carry out for our own permanent and bank staff are replicated in our supply chain.

We have a designated Head of Recruitment and have a Sponsorship Recruitment Toolkit to support our service managers with the process of recruiting safely and legally with regard to overseas workers. Our processes ensure we adhere to the Home Office employer obligations and compliance with immigration legislation.

## Our Supply Chain

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

- Temporary Staffing
- 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 services purchase from approved suppliers. Our contracts with our suppliers contain clauses relating to our mutual legal obligations to tackle modern slavery. We undertake appropriate due diligence on all suppliers to provide assurance that their policies, processes,

controls and monitoring are robust and that they and their contractors are committed to the principles of the Modern Slavery Act 2015.

If circumstances warrant, we will carry out additional compliance audits. If we find that suppliers have breached this policy, then we will take appropriate steps. This may range from remediation of breaches to termination of supply agreements.

### **Monitoring our effectiveness**

On an annual basis, we consider 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.

We have not received any reports from employees, anonymously through the confidential reporting line, external agencies or the public that any modern slavery practices have been identified.

Reports are submitted to the Board in accordance with the Somerset Care governance reporting schedule.

### **Board Approval**

This statement was made pursuant to s.54(1) of the Modern Slavery Act 2015 and approved by the Board of the Somerset Care Group who review and update this annually. This statement has been published and is available to view on the Somerset Care Website.

**Jonathan Plamer**  
**Chief Executive Officer**  
**01 April 2025**