

## Modern Slavery Act 2015 Exclusive Secure Care Services

This statement sets out the steps that Exclusive Secure Care Services has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Exclusive Secure Care Services has a zero- tolerance approach to any form of modern slavery and human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chains.

At ESCS we offer the following Services:

- Patient Transfer
- Conveyance
- Agency Staff
- Provisions for 16 - 18
- Crisis and Respite Care
- Outreach support
- Day care
- Daily living skills
- Support with personal care
- Supported holiday and short breaks
- Waking or sleeping night services

The range of complex needs we support includes:

- Learning disabilities
- Autistic Spectrum Disorders
- Mental health issues
- Challenging behaviour
- Sensory impairment
- Multiple diagnoses
- Epilepsy
- Drug dependency and misuse

We are committed to the following aims:

- Offer skilled care to enable people supported by us to achieve their optimum state of health and well-being.
- Treat all people supported by us and all people who work here with respect at all times.
- Uphold the human and citizenship rights of all who work and visit here and of all Service Users.
- Support individual choice and personal decision-making as the right of all Service Users.
- Respect and encourage the right of independence of all Service Users.
- Recognise the individual uniqueness of Service Users, staff and visitors, and treat them with dignity and respect at all times.
- Respect individual requirement for privacy at all times and treat all information relating to individuals in a confidential manner.

- Recognise the individual need for personal fulfilment and offer individualized programmes of meaningful activity to satisfy that need of Service Users and staff.

Exclusive Secure Care Services implements its business strategy in an ethically, socially and environmentally responsible manner. We fully acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights. The IBHR informs all of our policies related to the rights and freedoms of every individual who works for us, either as a direct employee, agency worker or indirectly through our supply chain. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our operations. Respect for the dignity of the individual – and the importance of each individual’s human rights – form the basis of the behaviours we expect in every workplace nationally.

We will not accept any form of discrimination, harassment or bullying and we require all of our managers to implement policies designed to increase equality of opportunity and inclusion for all employees including agency workers. We have also developed and implemented policies and processes which are intended to extend these commitments through our supply chain.

## **Policies**

We have several internal policies to ensure that we are conducting business ethically and transparently. These include:

- **Human Rights policy and our Ethics Policy** where we confirm that we will not tolerate or condone the abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected
- **Whistleblowing Policy**, aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated, and appropriate remedial actions are taken and we will work closely with social care and health providers ensuring that our policies and procedures dovetail with local procedures and best practice
- **A robust recruitment policy**, including conducting eligibility to work in the UK checks for all employees to safeguard
- **Employee Code of Conduct** consistent with any professional codes of conduct

## **Direct Communication**

The Company encourages members of the public or people not employed by us to write, in confidence, to raise any concern, issue or suspicion of modern slavery in any part of our business.

## **Suppliers**

We conduct due diligence on all suppliers before allowing them to become a preferred supplier. We include an online search to ensure that particular organisations have never been convicted of offences relating to modern slavery and we include our modern slavery policy as part of our contract with all suppliers. Suppliers are required to confirm that no part of their business operations contradicts this policy. As part of our contract with suppliers, they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their suppliers to account over modern slavery.
3. For UK based suppliers, they pay their employees at least the national minimum wage/national living wage (as appropriate) and to ensure that within their supply chains, where UK based suppliers have overseas supply chains, that their employees' pay is consistent with their national minimum wage requirements, working conditions are safe and fair, there is no child labour and working hours are not excessive.
4. We may terminate the contract at any time should any instances of modern slavery come to light.

### **Risk Assessments**

Our supply chains include procurement of staff, consumables, facilities maintenance, utilities and waste management [add further areas]. We have conducted a risk assessment and will ensure that we will take further steps to ensure that we support the eradication of modern slavery, that staff understand how to recognise modern slavery and the appropriate safeguarding reporting processes are followed should there be concerns within our supply chains, with customers or suppliers.

### **Performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies or local safeguarding teams to indicate that modern slavery practices have been identified.

### **Safeguards**

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 that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Exclusive Secure Care Services will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and makes validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

### **Responsibility for this Statement**

The ultimate responsibility for the prevention of modern slavery rests with the [*insert who at Senior Management level has responsibility*] for ensuring that this policy and its implementation complies with our legal and ethical obligations. Managers at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

### **Assessment of effectiveness in preventing Modern Slavery**

We understand that modern slavery risk is not static and will continue our approach to mitigating this risk. We will assess the risk via our internal auditing processes.

**This statement is made according to section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement of Exclusive Secure Care Services for the financial year ending 2023/4. Andrew Challoner of Exclusive Secure Care Services has approved this statement.**

Approval for this statement

This statement was approved by

A handwritten signature in black ink, appearing to be 'A. Challoner', written in a cursive style.

*Managing Partner*

05 April 2024