

Modern Slavery Statement

City Care Southwest Ltd offers care and support services to adults over the age of 65 in their own homes. Our service is regulated by the Care Quality Commission (CQC) in relation to the regulated activity “Personal Care” and in accordance with the Health and Social Care Act 2008 and its associated regulations 2014.

Version Control

Date	New Version #	Made by	Changes/updates	Review Date
16/11/2023	V1.2023	Rhiannon		16/11/2024
28/03/2024	V1.2024	Rhiannon	Inclusion of regulated activity statement and admin footer	28/03/2025

Statement and purpose of policy

City Care Southwest is committed to preventing slavery and human trafficking in all its forms within our operations and supply chains. We acknowledge our responsibility under the Modern Slavery Act 2015 and are dedicated to taking proactive measures to combat this heinous crime.

We have decided to publish a statement voluntarily.

Scope and Definition

This policy contains guidance from legislation and relevant bodies that all staff must adhere to. This includes:

- The Modern Slavery Act 2015

Responsibilities

The Nominated Individual/Directors will:

- Review this policy annually, or sooner as required.
- Conduct quarterly service audits which include a review of the efficacy of this policy in practice.
- Stay up to date with legislation, guidance, and best practice in relation to Modern Slavery.
- Undertake regular training as part of their continuing professional development.

The Registered Manager will:

- Implement this policy, ensuring that all staff read and understand it.
- Conduct bi-monthly service audits which include a review of the efficacy of this policy in practice.
- Undertake regular training as part of their continuing professional development.
- Stay up to date with legislation, guidance, and best practice in relation to Modern Slavery.

All staff will:

- Read and understand this policy.
- Attend regular, relevant training in Modern Slavery.
- Comply with this policy.

Modern Slavery Statement

Our Organisation

City Care Southwest Ltd is an organisation which was created to deliver care, support, and accommodation to some of the most vulnerable groups in our community. Our Adult's Service provides care and support to individuals in their own homes and our Children's Service is developing accommodation and support services for Children and Young People who are unable to stay in their familial home.

Our Approach

The Modern Slavery Act 2015 is designed to provide a comprehensive framework for combating modern slavery and protecting the rights and dignity of individuals who may be vulnerable to exploitation and trafficking.

City Care Southwest Ltd will ensure that:

- **We recognise and report our concerns** to protect individuals from various forms of exploitation, including slavery, servitude, forced or compulsory labour, and human trafficking.
- **We recognise and uphold** the fundamental human right to freedom.
- **We recognise and raise awareness** about the risks and indicators of modern slavery.

Our Supply Chain

As a service business, our supply chain is relatively small and consists of:

- Building and Maintenance Services for the Children's Service
- Uniform Supply
- PPE and Handwashing Supplies
- IT Services and Equipment
- Stationary Supplies
- Training Equipment and Supplies
- Accounting services
- Agency staffing services

In order to ensure that we are working in a way that prevents and recognises incidences of Modern Slavery, we are committed to ensuring that all suppliers receive a copy of our Supplier Code of Conduct (appendix 1) and must sign to confirm their agreement to these terms.

Suppliers will be audited to ensure that these terms are refreshed regularly, and to identify any non-compliance.

City Care Southwest Ltd has a zero-tolerance approach to Modern Slavery and where suppliers are found to have not upheld their commitment to the Modern Slavery Act, we will seek alternative suppliers.

Our Staff

All Staff undertake training in Safeguarding as part of their role, and managers complete enhanced training in this subject which covers Modern Slavery and the key identifiers which may indicate that someone is at risk of, or has been part of, Human Trafficking and Modern Slavery. Our Safeguarding policy and procedure provides clear direction to staff for reporting and responding to incidences of abuse or neglect.

Modern Slavery Statement

All staff working within our organisation, whether with Children and Young People or Adults, undergo a comprehensive vetting check which includes an Enhanced DBS Check, a minimum of three employment and character references and a full education and employment history check from the age of 16. This process assists us in safeguarding our clients from harm but also provides us with an opportunity to identify potential victims of Human Trafficking and Modern Slavery.

We provide all staff and clients with details of our Whistleblowing Policy so that they know that they can raise concerns about how colleagues are being treated, or practices with our business or supply chains without fear of reprisals.

Our Future

Our organisation is a dedicated and committed team of individuals who share a passion in upholding the rights of every person we come into contact with. As we grow, we will continue to develop community projects and initiatives which support the most vulnerable individuals and groups in our community and society.

Be the Change

Signed

Terri Lawes
Managing Director
Children's Services



29/04/2024

Rhiannon Williams
Managing Director
Adult's Services



29/04/2024

Modern Slavery Statement

Appendix 1

Supplier Code of Conduct

City Care Southwest Ltd is committed to ensuring that our supply chain is environmentally, socially, ethically, and economically responsible. For us to be assured of this, we ask all current and potential suppliers to acknowledge their compliance with our Supplier Code of Conduct.

Please review the statements below and confirm your acceptance of these terms.

Commitment to the Environment

Our organisation recognises the Climate Emergency, and we ask that all suppliers:

- Adhere to all relevant local and national environmental laws, regulations, and directives applicable to the countries where operations, manufacturing, or trade occur.
- Strive to prevent environmental harm and minimise negative impacts across the entire supply chain, encompassing sourcing of raw materials, manufacturing processes, product/service delivery, and waste disposal.
- Actively pursue the development and innovation of eco-friendly products and services, considering their entire lifecycle from production to use and disposal, including exploration of circular supply chain possibilities.
- Implement proactive measures to effectively mitigate identified environmental risks, such as through recycling initiatives, reduction of single-use packaging, decreased plastic usage, and enhanced energy efficiency measures.

Commitment to People

Our organisation recognises and promotes the rights of every person, and we ask that our suppliers commit to upholding the rights of every person in their organisation and supply chain.

In respect of forced and underage labour, our suppliers will:

- Ensure that workers have the freedom to choose their employment and resign from it with reasonable notice, without being required to provide a financial deposit or surrender personal belongings.
- Not be involved whatsoever in human trafficking activities, nor support or collaborate with organisations engaged in such practices.
- Adhere to the requirements of any anti-slavery or modern slavery legislation in the countries of operation and comply with both voluntary and mandatory reporting schemes to ensure transparency in this regard.
- Support the elimination of Child Labour and adhere to the national minimum age for employment, or a minimum age of 14, whichever is higher, unless a lower local minimum age is permitted under International Labour Organisation (ILO) Convention 138.
- In cases where a child is discovered to be involved in or performing child labour, the supplier must provide support to enable the child to complete at least their compulsory education, or an equivalent level of education as outlined in the UN Covenant on Economic, Social, and Cultural Rights. This support should be provided in a manner that does not worsen the conditions of the child or those reliant on their work.

Modern Slavery Statement

- Be assured that their suppliers adhere to these statements and commitments.

In respect of working conditions, our suppliers will:

- Ensure that at least the statutory minimum wage will be paid to all workers. If there is no statutory minimum wage applicable, a realistic living wage will be paid.
- Ensure that wages will be paid without discrimination to all workers and all non-statutory deductions must be reasonable and with the consent of the worker.
- Ensure that working hours are not excessive and do not exceed 48 hours. Maximum working hours shall not exceed 60 hours including overtime, unless under exceptional circumstances and allowed by national law.
- Ensure that there are adequate rest periods and breaks.
- Ensure that the working environment is safe and hygienic, and risks to workers are identified and mitigated or removed.
- Ensure that workers receive appropriate training and instruction in the use of equipment and tools.
- Ensure that workers have appropriate personal protective equipment and that this is provided free of charge.

In respect of fair working practices, our suppliers will:

- Ensure that workers have the freedom to choose to be part of a trade union or similar organisation and be free to leave if they wish.
- Ensure that the workplace is free from discrimination, harassment, violence, or victimisation and that all workers are treated with dignity and respect.
- Ensure that workers are not treated unfairly or discriminated against for any reason. This could include education, social class/caste, nationality, trade union membership, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.

Commitment to Ethical Practices

Our organisation is committed to working ethically and ensuring that we meet our financial obligations. We ask that our suppliers:

- Adhere to the legislation, regulations, and financial/tax requirements of the countries they are working in, manufacturing in or trading with, as applicable.
- Not be involved in any way with acts of corruption or bribery, participate in anti-competition practices/cartels or support acts of violence or terrorism or abuse of individual people or communities.
- Not force unsustainable or unfair contract terms on their suppliers, or throughout their supply chain, nor allow unfair exploitation of a dominant market or customer position.
- Support fair trade conditions for producers, where applicable.
- Always act with respect and integrity, including open and transparent accounting.
- Allow staff protection if reporting misconduct or raising concerns with respect to their own, or another organisation, and ensure all affected staff are treated in a fair and transparent manner.
- Have undertaken due diligence of their supply chains and impacts caused by their activities, and actively seek out ways in which to minimise such negative impacts.

Modern Slavery Statement

Supplier Agreement

I, the undersigned, acting as a representative of my organisation/company, hereby confirm our agreement to the terms detailed in City Care Southwest Ltd.'s Supplier Code of Conduct and shall ensure its supply chain adheres to the Code of Conduct also, to be assured of and promote sound social, ethical, environmental, and economic practises.

Organisation/Company Name	
Name	
Role or Position	
Signature	
Date	