

Pioneering Care Partnership

Modern Slavery and Human Trafficking Policy



Policy Statement

Pioneering Care Partnership (PCP) recognises its duties under the Modern Slavery Act 2015 and, in doing so, strictly prohibits the use of modern slavery and human trafficking in our operations. This policy applies to all staff, contractors and volunteers working for us and those in our supply chain who operate on behalf of PCP in any capacity.

PCP has implemented systems and controls aimed at ensuring modern slavery is not taking place and we expect our suppliers will hold their own suppliers to the same high standards.

Scope

This Policy applies to all staff, PCP's volunteers and Trustees and Third Party Providers. This policy is to be applied consistently and in line with PCP core values.

Definitions

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Modern slavery is a crime and a violation of fundamental human rights.

Human trafficking involves the recruitment or movement of people for exploitation by the use of threat, force, fraud, or the abuse of vulnerability. Trafficking is a crime that can occur across international borders or within a country. It often crosses multiple geographic and legal boundaries. Men, women and children may be trafficked for various purposes. They include labour sectors (for example, agriculture, food processing, manufacturing, services), domestic servitude, forced begging and petty theft and sexual exploitation. [source: www.gov.uk]

Commitments

PCP expects that everyone working with us, or on our behalf, will support and uphold the following measures to safeguard against modern slavery:

- A zero-tolerance approach to modern slavery across the organisation and all supply chains.
- Pre-employment checks, including references, proof of identity and any other steps considered necessary for new employees.
- PCP's Whistleblowing Policy will detail modern slavery as a protected disclosure.
- PCP will only engage with sub-contractors who confirm compliance with the Act.
- All third-party contracts/agreements will include the requirement to comply with the Act, and PCP's right to terminate if there is a potential breach.
- All staff involved in procurement decisions will receive training on modern slavery.
- As part of our procurement process, PCP will only engage with suppliers and contractors who confirm their compliance with the Act.

Sanctions

As part of the organisations zero tolerance approach, any member of staff considered to be potentially involved in modern slavery or human trafficking will be subject to disciplinary proceedings.

Where PCP suspects others associated with the organisation working may have breached the Modern Slavery Act (2015) we will ensure appropriate action. This may include terminating any relationship/contract and reporting to relevant statutory bodies.

Responsibilities

Senior Leaders responsible for ensuring that the Policy is reviewed, disseminated and implemented and involving people from across the organisation to ensure the appropriate checks are in place and followed. They will also ensure middle managers are aware of this policy and the organisations approach through an annual update at Management Development Team meetings

Human Resources are responsible for ensuring that appropriate training to raise awareness of this Policy is available and that it is included in staff induction.

Prevention, detection and reporting of modern slavery is everyone's responsibility. **All employees** must play an active role in reporting any activity if they have any concerns relating to modern slavery or human trafficking.

Related Policies and Procedures

This Policy should be read in conjunction with the following PCP policies, procedures or guidance:

- Whistleblowing

Relevant Legislation

This Policy is in line with the following relevant legislation:

- Modern Slavery Act 2015

Policy Communication

PCP will ensure that:

- All employees receive a copy of this policy during the induction process
- Generic policy training will include examples or reference to this policy
- This policy is easily accessible by all members of the organisation both electronically and hardcopy. It will also be available on PCP's website.
- Employees are informed when a particular activity aligns with this policy
- Employees are empowered to actively contribute and provide feedback to the policy and;
- Employees are notified of all changes to this policy in a timely manner

Monitoring and Review

This Policy will be reviewed by HR on a regular basis to ensure that it remains compliant. A full formal review will also take place every 3 years by Senior Leadership Team as part of the Policy Review Cycle, and where applicable approved by the Board of Trustees.

April 2025

Policy document tracking

Action	Date(s)
Draft to SLT:	16 December 2024
Policy Approved	24 March 2025
Approved Policy uploaded and circulated:	1 April 2025
Interim Review Date:	N/A
Main Review Date:	February 2028
SLT Lead for Review	Operations Manager

If this policies or procedure is not reviewed in line with the review date indicated then this version remains valid until such time it is updated and reviewed.