	<b>Modern Slavery and Trafficking</b>	Ref:	68
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The aim of this policy is to ensure that everyone at Serendipity Healthcare Ltd is aware of the Modern Slavery and Human Trafficking Policy and Procedure and the procedures in place to identify, respond appropriately and report in line with local and the [national guidance](#). This policy refers to adults who may be at risk, the procedure for children is detailed in the Child Protection Policy and Procedure.

Serendipity Healthcare Ltd will ensure that staff understand Derbyshire County Council, Sheffield City Council, Nottinghamshire County Council safeguarding reporting procedures and that these procedures are communicated to all staff.

We also aim to meet the legal requirements of the regulated activities that Serendipity Healthcare Ltd is registered to provide:

We promote awareness of concerns surrounding slavery and human trafficking and promote the commitment of Serendipity Healthcare Ltd in addressing slavery and human trafficking in all its forms. An annual statement will be produced, where applicable.

We aim to ensure that identification, protection, care, and support for victims of modern slavery and human trafficking is at the heart of our safeguarding procedures at Serendipity Healthcare Ltd.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which include the deprivation of a person's liberty by another to exploit them for personal or commercial gain.


Serendipity Healthcare Ltd has a zero-tolerance approach to modern slavery within the business and supply chains and we are committed to acting ethically and with integrity in all our dealings and relationships. We will implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in Serendipity Healthcare Ltd or within any third parties (agencies) that we are associated with.

All staff will be made aware of the issues surrounding slavery and human trafficking, whilst being encouraged and supported to report any concerns to Serendipity Healthcare Ltd management. Serendipity Healthcare Ltd will also support any staff that may be subject to slavery or human trafficking.

Where modern slavery or human trafficking is identified, Serendipity Healthcare Ltd will share information with the Derbyshire County Council, Sheffield City Council, Nottinghamshire County Council Safeguarding Team to safeguard the individual from harm and with the objective of preventing future situations arising, to promote the elimination of routes and sources of slavery or human trafficking.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance of their roles.

All employees who suspect any members of the workplace being victim of modern slavery must notify their line manager.

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Serendipity Healthcare Ltd will take steps to ensure that sufficient communication and employee awareness training is undertaken with regards to Modern Slavery.

All employees will be made aware of the **Whistleblowing Policy and Procedure** at Serendipity Healthcare Ltd. The purpose of this policy and associated procedure is to enable Serendipity Healthcare Ltd to thoroughly investigate allegations of any wrongdoing raised by employees within Serendipity Healthcare Ltd without fear of reprisal.

Serendipity Healthcare Ltd will use this policy to underpin and inform any statement on slavery and human trafficking that we may be required to produce to meet the requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

### **Reporting Modern Slavery and Human Trafficking Concerns**

The following procedure must take place where there are any concerns that someone is a victim of modern slavery or human trafficking. Serendipity Healthcare Ltd must ensure that staff are aware that victims of modern slavery or trafficking will often not self-identify. Many will present with a different issue.

- 1) A concern is identified -This could be a Service User as a victim or perpetrator, or a Service User informs us of a concern they have
- 2) If an individual is, or group of people are, in immediate risk of danger or harm, the police must be immediately notified on 999
- 3) The staff member must discuss this with their line manager (where appropriate) and the Registered manager
- 4)The Registered manager contacts and escalates the concern immediately to Derbyshire County Council, Sheffield City Council, Nottinghamshire County Council Safeguarding Adults Team
- 5) A notification is made to the CQC via the provider portal

### **Safer Recruitment**


All staff engaged with providing services at Serendipity Healthcare Ltd will be subject to thorough and rigorous recruitment procedures that will include a DBS check, identity check, confirmation of validity to work in the UK, employment history, suitability for the role and references. This will minimise the chance of employing a person that has been, or is subject to, slavery or human trafficking. Serendipity Healthcare Ltd will follow the **Right to Work Policy** to ensure that a robust and fair process is followed at all times.

Serendipity Healthcare Ltd will only use staff provided by third-party organisations (such as agencies) that are either registered with the regulator or who can confirm that the staff being supplied are free to work in the UK and meet all the requirements for the role being provided for.

### **Training**

All staff will undertake training on Modern Slavery and Human Trafficking. This will ensure that they are aware of the indicators of modern slavery which include:

- Individuals not being paid for the work they undertake


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- Individuals being held in debt-bondage (being told they “still” owe money after having paid off a previous debt)
- An individual’s passport being held by their “employer” in order to keep the individual at work
- Multiple benefit claimants having their benefits being paid into the same account
- An individual not having the freedom of movement (i.e., passport being taken)
- Clear exploitation of an individual by another for financial or sexual gain
- Shows signs of physical or psychological abuse, look malnourished or unkempt, anxious/agitated or appear withdrawn and neglected. They may have untreated injuries
- Rarely be allowed to travel on their own, seem under the control, the influence of others, rarely interact or appear unfamiliar with their neighborhood or where they work
- Relationships which do not seem right - for example, a young teenager appearing to be the boyfriend/girlfriend of a much older adult
- Be living in dirty, cramped, or overcrowded accommodation, and/or living and working at the same address
- Have no identification documents, have few personal possessions, and always wear the same clothes day in and day out. What clothes they do wear may not be suitable for their work
- Have little opportunity to move freely and may have had their travel documents retained, e.g., passports
- Be dropped off/collected for work on a regular basis either very early or late at night
- Unusual travel arrangements - children being dropped off/picked up in private cars/taxis at unusual times and in places where it is not clear why they would be there
- Avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family

Staff will be advised that if they are subject to slavery or human trafficking, if they are aware of any individual that may be subject to slavery or has been trafficked, or if slavery or human trafficking is disclosed to them, they must inform the Registered Manager of Serendipity Healthcare Ltd or the police.

### **The Health and Safety of Workers**

As a responsible organisation, it is important that the relevant local or national government policies are implemented throughout the supply chain at Serendipity Healthcare Ltd. Serendipity Healthcare Ltd will ensure that suppliers adopt social distancing measures and pay statutory sick pay in order to prevent the spread of coronavirus as part of due diligence processes.

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## Review of Effectiveness

Serendipity Healthcare Ltd intends to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the supply chains of our providers. We will also continue to:

- Support our staff to understand and respond to modern slavery and human trafficking, and the impact that each and every individual working in Care can have in keeping present and potential future victims of modern slavery and human trafficking safe
- Gain assurance that all staff at Serendipity Healthcare Ltd have access to training on how to identify victims of modern slavery and human trafficking
- Review the Safeguarding Policy and Procedure at Serendipity Healthcare Ltd to ensure that Modern Slavery and Human Trafficking are integral within the content and staff are directed to support and advice as needed

## Indicators of Forced Labor

- Individuals may show signs of psychological or physical abuse. They might appear frightened, withdrawn or confused
- Workers may not have free movement and may always be accompanied
- Individuals often lack protective equipment or suitable clothing and have not been trained to safely fulfil the requirements of the role
- The person may not have access to their own documents, such as ID or their passport, with the employer having confiscated them
- Individuals may not have a contract and may not be paid National Minimum Wage or not paid at all
- Workers are forced to stay in accommodation provided by the employer. This accommodation could be overcrowded


Individuals could live on site

- Workers could be transported to and from work, potentially with multiple people in one vehicle
- The person might not accept money or be afraid to accept payment
- Workers may work particularly long hours
- FGM, radicalisation, forced marriage

## Section 52 Modern Slavery Act

This places a duty on Local Authorities to identify and refer modern slavery child victims and consenting adult victims through the National Referral Mechanism (NRM) This responsibility identifies a local authority as a First Responder. The Council as a first responder (FR) into the NRM process has a duty to notify the Home Office if anyone working within the council identifies a person with indicators suggesting they may be trafficked or enslaved

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### Physical Appearance

- Shows signs of physical or psychological abuse, look malnourished or unkempt, anxious/agitated or appear withdrawn and neglected. They may have untreated injuries

### Isolation

- Rarely be allowed to travel on their own, seem under the control, the influence of others, rarely interact or appear unfamiliar with their neighborhood or where they work
- Relationships which do not seem right - for example, a young teenager appearing to be the boyfriend/girlfriend of a much older adult

### Poor Living Conditions

- Be living in dirty, cramped, or overcrowded accommodation, and/or living and working at the same address

### Restricted Freedom of Movement

- Have no identification documents, have few personal possessions, and always wear the same clothes day in and day out. What clothes they do wear may not be suitable for their work
- Have little opportunity to move freely and may have had their travel documents retained, e.g., passports

### Unusual Travel Times

- Be dropped off/collected for work regularly either very early or late at night
- Unusual travel arrangements - children being dropped off/picked up in private cars/taxis at unusual times and in places where it is not clear why they would be there

### Reluctant to Seek Help

- Avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family

### The Following Signs Could Indicate a Situation of Labour Exploitation:


- Individuals may show signs of psychological or physical abuse. They might appear frightened, withdrawn or confused
- Workers may not have free movement and may always be accompanied
- Individuals often lack protective equipment or suitable clothing and have not been trained to safely fulfil the requirements of the role
- The person may not have access to their documents, such as ID or their passport, with the employer having confiscated them
- Individuals may not have a contract and may not be paid National Minimum Wage or not paid at all
- Workers are forced to stay in accommodation provided by the employer. This accommodation could be overcrowded
- Individuals could live on site
- Workers could be transported to and from work, potentially with multiple people in one vehicle
- The person might not accept money or be afraid to accept payment
- Workers may work particularly long hours

### The Following Signs Could Indicate a Situation of Sexual Exploitation:

- Sex workers may appear scared or intimidated
- The individual may be transported to and from clients
- Individuals may be closely guarded
- The person may be 'branded' with a tattoo indicating ownership
- Sex workers may show signs of physical abuse, including bruising, scarring and cigarette burns
- The individual may be unable to keep payment and may have restricted or no access to their earnings
- The person may have a limited English vocabulary, restricted to sexualised words
- Multiple female foreign nationals may be living at the same address
- The person may sleep in the premise in which they work, which could indicate a brothel is operating
- A property might have male callers' day and night who only stay for a short time
- There may be details of sexual activity such as cards and advertisements found nearby

### The Following Signs Could Indicate a Situation of Domestic Servitude:

- The individual may be held in their employer's home and forced to carry out domestic tasks such as providing childcare, cooking, and cleaning
- The individual may not be able to leave the house on their own, or their movements could be monitored
- The person may work over normal working hours

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- The individual may not have access to their belongings, including their ID, but also items such as their mobile phone, which can isolate them
- The employer may be abusive, both physically and verbally
- The person may not interact often with the family they are employed by
- The person may be deprived of their personal living space, food, water, or medical care
- The individual may stand out from other family members, noticeable as they may wear poorer quality clothing

**The Following Signs Could Indicate a Situation of Criminal Exploitation:**

- A large group of adult or children beggars might be moved daily to different locations but return to the same location every night. This could indicate forced begging
- An individual might be transported to or from the scene of a crime, including shoplifting, pickpocketing or forced begging
- An individual may not benefit from the money or items they have obtained through the crimes they have been forced to commit
- A person may be forced to cultivate cannabis with their freedom of movement restricted; including being locked in a room. Commonly, the individual may not be able to speak English or have a limited vocabulary
- A vulnerable person may be forced or manipulated out of their home by drug dealers who use the home as a base to sell drugs
- Young people may be forced to transport and sell drugs across county borders, which is known as County Lines

**The Following Signs Could Indicate a Situation of Child Exploitation:**

- The child may have mood swings, including being angry, upset or withdrawn
- The child may show signs of inappropriate sexual behavior
- They may be dressed inappropriately for their age
- The child may go missing at night or weekends and may not be clear about their whereabouts
- They may not attend school
- The child may have gifts, presents or expensive items which they cannot explain

Reviewed:- 14<sup>th</sup> October 2025

S L Pickles  
Director

# DOMESTIC

IT'S CLOSER THAN YOU THINK

To report concerns, seek  
advice or get help call  
the **confidential** UK  
Modern Slavery Helpline  
or visit the website



0800 012 1700

MODERNSLAVERYHELPLINE.ORG

# DOMESTIC SERVITUDE

BEING HELD WITHIN A HOUSE AGAINST THEIR WILL AND  
FORCED TO WORK LONG HOURS IN UNACCEPTABLE CONDITIONS

## SPOT THE SIGNS

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DO THEY EVER  
LEAVE THE HOUSE  
ON THEIR OWN?



DO THEY WORK IN  
EXCESS OF NORMAL  
WORKING HOURS?



DO THEY SEEM  
AFRAID OR  
ANXIOUS?

Or seem to be on call 24  
hours a day?



CAN THEY FREELY  
CONTACT THEIR  
FRIENDS OR FAMILY?



WHAT CONDITIONS  
ARE THEY LIVING IN?  
Have they ever been  
harmed or deprived of food,  
water, sleep, medical care?



HAVE THEIR PASSPORT OR  
DOCUMENTS BEEN TAKEN  
AWAY?



DO THEY STAND OUT  
FROM OTHER FAMILY  
MEMBERS?  
Are they quieter, wearing  
poorer quality clothing etc?

0800 012 1700 | MODERNSLAVERYHELPLINE.org



HM Government



PP085 – Modern Slavery and Human Trafficking  
Human Resources - Performance & Discipline  
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