

Beyond Limits Dumfries & Galloway provides policies and procedures to promote safe and consistent practice across the Organisation. The framework laid down within our policies and procedures lets everyone know how we work and reflects our values and mission statement. Our policies and procedures are written to help us, employees of Beyond Limits Dumfries & Galloway, to make good, safe decisions.

Beyond Limits Dumfries & Galloway expects all employees to be familiar with the contents of all policies and procedures relevant to their role and to understand how to apply them within their daily work.

None of these documents stand alone, all fit within the larger framework of how we work and any associated policies which are particularly relevant will be directly referenced.

Modern Slavery and Human Trafficking Policy

To be read in association with the Recruitment and Selection Policy and the Equality & Diversity policy.

Modern Slavery and Human Trafficking Policy – what this means to Beyond Limits Dumfries & Galloway

This policy clarifies our organisational position on modern slavery and human trafficking, based upon our commitment to playing an active role in eradicating modern slavery.

INTRODUCTION

Beyond Limits Dumfries and Galloway believe in the promotion and protection of human rights. Our ethos and values are inextricably linked to this belief. Therefore, we are:

- Committed to acting in an ethical and socially responsible manner; and

- Remain committed to actively contributing towards the eradication of modern slavery and human trafficking.

Understanding the need to eradicate modern slavery and human trafficking is not only crucial to our ethos and values, but also wholly consistent with the Care Inspectorate's position on Modern Slavery, which includes the following summary:

"Being alert to potential cases of modern slavery and listening sensitively and compassionately when people raise issues with them". They will respond by taking regulatory and enforcement action against registered providers where they identify a risk of harm and breaches of regulation".

As consistent with the Care Inspectorate's position, Beyond Limits Dumfries and Galloway fully recognise that we have a part to play in eradicating modern slavery and human trafficking. As such, we expect that colleagues will be alert to any potential concerns about modern slavery and human trafficking and escalate those concerns to a senior colleague without delay.

POLICY STATEMENT

Beyond Limits Dumfries and Galloway are committed to the aims and principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

Anti-slavery policies were introduced by the government in the United Kingdom in 2015 under the Modern Slavery Act 2015. Specifically, Section 54 of the Act refers to "transparency in supply chains" which are set out to ensure organisation's supply chains are slavery free. The resulting conditions describe actions that must be taken within our organisation to avoid any risk of having participated in slavery throughout the supply chain.

Companies are required to provide an anti-slavery policy if they comply with the following:

- It is a 'body corporate' or a partnership, wherever incorporated or formed
- It carries on a business, or part of a business, in the UK
- It supplies goods or services
- It has an annual turnover of £36 million or more

Beyond Limits Dumfries and Galloway have implemented our Modern Slavery & Human Trafficking Policy in the interests of supporting the abolition of modern slavery and human trafficking.

We seek to maintain a non-discriminatory and respectful working environment for all colleagues. We believe colleagues should feel confident that they can expose wrongdoing without any risk to themselves, which we consider as a fundamental principle of safe practice.

Our safer recruitment procedures and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK. This helps to safeguard employees from any abuse or coercion.



We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

WHAT IS MODERN SLAVERY AND HUMAN TRAFFICKING

Sadly, the concept of 'slavery' has not been confined to history. 'Human trafficking' is probably a more recognisable term, and this is included in the wide definition of modern slavery, along with:

- Forced work, through physical or mental threat
- Being owned or controlled by the employer through actual or threatened mental or physical abuse
- Being treated as a commodity or being traded as property
- Being physically constrained or having restrictions places on freedom of movement

Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting. Victims of modern slavery can be any age, gender, nationality, and ethnicity. They are tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation. They may not recognise themselves as a victim.

SIGNS AND INDICATORS OF MODERN SLAVERY

The following list is not exhaustive but does cover key indicators or signs that an individual is a victim of modern slavery. Individuals may:

- Appear scruffy, malnourished, or injured.
- Present in a way that is anxious, afraid, or unable to make eye contact.
- Work long hours, wearing unsuitable clothing or have the wrong equipment for the job.
- Live in overcrowded, poorly maintained properties and/or are the curtains always closed.
- Behave like they're being instructed by someone else, picked up/dropped off at the same time and place every day or don't have access to money or identification.

Cases of modern slavery are on the increase and are happening in our communities every day. Please see [HERE](#) for more details.

OUR SERVICES AND PROVISIONS



Beyond Limits Dumfries and Galloway provide supported living services to people living in their own homes. We specialise in providing 'bespoke' packages of care for adults with learning disabilities, autistic spectrum disorders, mental illness, or physical disabilities.

INDIVIDUALS RECEIVING OUR CARE AND SUPPORT

Many of the people we support are extremely vulnerable for several reasons, and we recognise that there is potential for individuals to have been targeted for slavery before they received support from us. For example, we understand that adults with learning disabilities, autistic spectrum disorders, mental illness, or physical disabilities can be at greater risk of exploitation and abuse. As such, colleagues shall be provided with relevant training and guidance that will increase awareness of the need to be vigilant to the signs and indicators of modern slavery.

OUR COLLEAGUES

All colleagues are recruited using robust conditions of safe recruitment. This includes thorough suitability checks that involve confirmation of identity and importantly, right to work in the UK checks.

OUR SUPPLY CHAIN

Beyond Limits Dumfries and Galloway is a social care provider. Notwithstanding the risks to the individuals accessing our care and support provisions and services (N.B. Risks are identified and mitigated through our safeguarding policies and procedures), we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited. We procure goods and services from a restricted range of UK suppliers, which includes legitimate:

- Stationery/office equipment suppliers.
- Furniture retailers;
- Vehicle dealers (where applicable); and
- Recruitment businesses.

We work exclusively upon a commissioned basis, providing social care services to local authorities.

Beyond Limits Dumfries and Galloway aim to maintain a best practice approach to aid the combatting of modern slavery and human trafficking. Furthermore, it is essential that our suppliers understand and appreciate the standards of business conduct that are expected of any company. As such, we only seek to engage with reputable organisations who maintain a zero-tolerance of modern slavery and human trafficking.

WHEN CONCERNS ARE IDENTIFIED



If it is alleged or suspected that a supplier has engaged in modern slavery or human trafficking or profited from those who have engaged in modern slavery or human trafficking, we expect that colleagues will speak up and raise those concerns. Any such allegations or suspicions will be treated as an adult protection concern and will be escalated to relevant agencies, such as the local Adult Protection Committees and the Police. In all cases, it is essential that [Kathleen Griffiths](#) is informed in her capacity as the Designated Safeguarding Lead (DSL) and a designated senior colleague is named as a lead professional who will liaise with the relevant authorities and/or agencies as required.

CARE INSPECTORATE ACTION

The strategic aim of the Care Inspectorate is to *work constructively with partners to end modern day slavery in Scotland's social care system.*

In addition, all colleagues should be aware that the Care Inspectorate will be alert to potential cases of modern slavery and will listen sensitively and compassionately when people raise issues. They will respond in the following ways:

- If they receive or discover information that may indicate modern slavery, they will identify and record the threat
- They will refer identified and potential victims through their established safeguarding referral routes
- They will monitor registration applications to check for warning signs of potential exploitation of skilled workers from overseas.
- They will seek out early indication that sponsor licenses are being exploited by working closely with Home Office and other partners
- They will not hesitate to take action including proportionate regulatory and enforcement action where modern slavery and unethical recruitment practises pose a potential risk of harm
- They will work with other organisations to prevent, disrupt and reduce the likelihood of modern slavery in social care.

RESOURCES AND INFORMATION FOR COLLEAGUES

The Gangmasters and Labour Abuse Authority (GLAA) is a UK-wide non-departmental public body who are tasked with tackling:

- Labour exploitation
- Modern slavery
- Human trafficking
- Illegal gangmaster activity

They have produced a film highlighting modern day slavery in the workplace. It is aimed at raising awareness and helping to identify the signs of labour exploitation.

The film shows three scenarios before ultimately ending with the right approach to dealing with a suspected case of modern slavery. It is recommended that all colleagues take the time to view the video, and view the resources below:



- Modern Slavery Awareness booklet [download here](#)
- Spot the signs [download here](#)

If you are concerned about a colleague or a member of your community you can make a report to the GLAA.

They have the following authority in Scotland:

- Investigate modern slavery and labour exploitation – They will work with Police Scotland and other agencies
- Licensing of labour providers (e.g. in agriculture, food processing) – Labour providers in certain sectors must be licensed across the UK, including Scotland
- Enforcement of GLAA – GLAA can conduct inspections and take enforcement action

However, they do not have any Powers under the Police and Criminal Evidence Act (PACE). PACE powers do not apply in Scotland – instead the GLAA must work jointly with Police Scotland to carry out arrests or use warrant powers.



TRAINING OPPORTUNITIES

NHS Education for Scotland (NES) hosts a Modern Slavery Awareness Module. It is available via Turas Learn (NES's free online learning platform). You can access [HERE](#) and create your free learning account.

Unseen UK is UK wide organisation which offers CPD-accredited online training and although UK wide it includes content relevant to Scotland. You can access [HERE](#)

GENERAL RESOURCES AND GUIDANCE

Colleagues are encouraged to click or tap upon the links below to enhance their knowledge and understanding of modern slavery:

- [Scotland Against Modern Slavery](#)
- [Modern Slavery Helpline](#)
- [Human trafficking: support - mygov.scot](#)
- [National Referral Mechanism Toolkit March 2021.pdf](#)

