



# BEYOND LIMITS

Beyond the limits of conventional support

## Modern Slavery & Human Trafficking Policy

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.

January 2024

Review: January 2025

## INTRODUCTION

Beyond Limits 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 CQC's Modern Slavery and Human Trafficking Statement, which includes the following summary:

Modern slavery and human trafficking is incompatible with the Care Quality Commission's (CQC's) values which include being caring and acting with integrity. We fully support the government's objective to eradicate modern slavery and human trafficking. We recognise the responsibility that we have – both as the independent quality regulator of health and adult social care in England, and as a large organisation that employs more than 3,000 staff and procures external services.

As consistent with the CQC's position, Beyond Limits 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.

## BEYOND LIMITS POLICY STATEMENT

Beyond Limits 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. These policies were 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 partaken 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 have implemented our Modern Slavery & Human Trafficking Policy in the interests of supporting the abolition of modern slavery and human trafficking.**

**We seek to consistently 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 & 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 placed 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.**

**In addition to the above, the CQC have published a helpful definition of modern slavery and human trafficking, aligned with the conditions of the Modern Slavery Act 2015:**

**The Modern Slavery Act 2015 consolidated and clarified previously existing law that related to slavery and human trafficking. The Act categorises offences of 'slavery, servitude and forced or compulsory labour', and 'human trafficking'. These crimes include knowingly holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them during or soon after. Although human trafficking often involves an**

international cross-border element, it is also possible to be a victim of modern slavery or human trafficking without crossing a national border.

## **SIGNS & 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.**

## **OUR SERVICES & PROVISIONS**

**Beyond Limits 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.**

## **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.**

## **INDIVIDUALS RECEIVING CARE AND SUPPORT**

**Many of our individuals are extremely vulnerable for several reasons, and we recognise that there is potential for individuals to have been targeted for slavery before they came to 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. (Please refer to Signs and Indicators of Modern Slavery above)**

## OUR SUPPLY CHAIN

Beyond Limits 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 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 safeguarding concern and will be escalated to relevant agencies, such as the local Safeguarding Adults Partnership/Board and the Police. In all cases, it is essential that the Designated Safeguarding Lead (DSL) is informed, and a designated senior colleague is named as a lead professional who will liaise with the relevant authorities and/or agencies as required.

## CQC ACTION

To augment the CQC's position in relation to modern slavery and human trafficking, they have strengthened their approach to tackling modern slavery and human trafficking 'across all aspects of [their] regulatory work.'

**All colleagues shall be aware that:**

- Where [the CQC] have concerns that modern slavery or human trafficking may be taking place in a health or social care setting, [the CQC] will refer any known victims through [their] established safeguarding referral routes. These victims could be staff working in a service or people using a service. We will refer modern slavery or human trafficking safeguarding concerns to agencies that are first responders under the National Referral Mechanism for victims of human trafficking or modern slavery.
- In addition, when [the CQC] come across any organisation where [there are] concerns that they are engaged in modern slavery, [the CQC] will share [those] concerns with agencies that have the remit to investigate and take enforcement action under the Modern Slavery Act 2015. [The CQC] will do this through existing protocols that [they] have already established. This referral route will be included in [the CQC's] brief guide to inspectors.
- The use of modern slavery might result in breaches of the regulations that [the CQC] enforce. [The CQC] will respond to these breaches in line with our enforcement policy. [They] may then take enforcement action that could include changes or cancellation of a registered person's registration. Action to address modern slavery within a registered provider might also have an impact on the people using their services, for example if many staff in an adult social care service are victims of slavery. In these cases, [the CQC] will work closely with other agencies to coordinate enforcement action and responses through agreed protocols to protect people using services.

## RESOURCES & INFORMATION FOR COLLEAGUES

The Gangmasters and Labour Abuse Authority (GLAA) have produced a film highlighting modern day slavery in the workplace. It is aimed at employers and is designed at raising awareness and helping your staff identify the signs of labour exploitation.

The film then shows three scenarios before ultimately ending with the right approach to dealing with a suspected case of modern slavery.



It is advised that all colleagues take the time to view the video, and view the resources below:

- **HELP Them leaflet** [download here](#)
- **Gangmaster Victims poster** [download here](#)

The Independent Anti-Slavery Commissioner (IASC) provides an SME Toolkit, jointly commissioned by the STOP THE TRAFFICK and Shiva Foundation, that seeks to provide practical guidance for small and medium sized enterprises (SMEs) on how they can prevent modern slavery in their business operations. Please note that useful resources are available already, but none – to date - of the existing free resources are designed specifically for SMEs.

Colleagues can access the toolkit here:

[https://shivafoundation.org.uk/wpcontent/uploads/2021/02/SF\\_STT\\_SMEToolkit\\_2102.pdf](https://shivafoundation.org.uk/wpcontent/uploads/2021/02/SF_STT_SMEToolkit_2102.pdf)

## TRAINING OPPORTUNITIES

At the time this policy is issued, free training on modern slavery and human trafficking is being provided by Learning Pool. To begin an e-learning course colleagues may click or tap [HERE](#)

## GENERAL RESOURCES & GUIDANCE

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

- <https://www.antislavery.org>
- [www.humantraffickingfoundation.org](http://www.humantraffickingfoundation.org)
- [Government 2020 Annual Report on Modern Slavery published in March 2021](#)
- [modernslaveryhelpline.org](http://modernslaveryhelpline.org)
- How the [Salvation Army](#) helps victims of modern slavery
- [Factsheets for victims](#)
- [Modern Slavery Act 2015 overview](#)
- [National referral mechanism guidance: adult \(England and Wales\)](#)
- [First responders can report modern slavery on the UK Government website](#)
- [NSPCC Child trafficking and modern slavery](#)
- [Number of potential victims of modern slavery referred into the National Referral Mechanism \(NRM\) or via the Duty to Notify \(DtN\) process from 1 January to 31 December 2020](#)
- [The United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime](#)

