Medicare People

LIVE-IN CARE

Modern Slavery and Human Trafficking Policy and Procedure

Policy Title	Modern Slavery and Human Trafficking Policy and Procedure
Organisation	Medicare People Limited
Service Type	Live-In Care Services
Policy Owner	Managing Director
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1. PURPOSE

Medicare People is committed to preventing modern slavery, human trafficking, forced labour, servitude, exploitation, and abuse in all aspects of its activities.

The purpose of this policy is to ensure that employees understand how to identify potential indicators of modern slavery, respond appropriately to concerns, and take action to safeguard individuals who may be at risk.

This policy aims to:

- Prevent modern slavery and human trafficking.
- Protect service users, employees, and other individuals from exploitation.
- Promote safeguarding responsibilities.
- Ensure concerns are reported and investigated appropriately.
- Support compliance with legal and regulatory requirements.
- Promote ethical employment practices.
- Foster a culture of vigilance and accountability.

2. Scope

This policy applies to:

- All employees.
- Live-In Carers.

- Care Coordinators.
- Assessors.
- Managers.
- Agency workers.
- Contractors.
- Recruitment partners and suppliers where applicable.

This policy applies to concerns relating to both service users and employees.

3. Definitions

Modern Slavery	Modern slavery is an umbrella term used to describe offences involving slavery, servitude, forced or compulsory labour, and human trafficking.
Human Trafficking	The recruitment, transportation, transfer, harbouring or receipt of individuals through force, coercion, deception or abuse for the purpose of exploitation.
Forced Labour	Work or services performed under threat, coercion or punishment where an individual has not volunteered freely.
Servitude	A situation in which a person is obliged to provide services and feels unable to leave due to coercion, intimidation, or exploitation.
Exploitation	The abuse of a person's vulnerability for financial, personal, criminal, labour or other gain.

4. Policy Statement

Medicare People has a zero-tolerance approach to modern slavery and human trafficking.

The organisation will:

- Promote ethical recruitment practices.
- Take all concerns seriously.
- Support safeguarding investigations.
- Work collaboratively with relevant authorities.
- Ensure employees receive appropriate training and awareness.
- Monitor practices that could place individuals at risk.
- Protect employees from exploitation and abuse.
- Promote safe reporting of concerns.
- Investigate allegations promptly and appropriately.

All employees have a responsibility to remain vigilant and report concerns immediately.

5. Roles and Responsibilities

Managing Director

The Managing Director is responsible for:

- Providing overall governance oversight.
- Promoting ethical employment practices.
- Ensuring compliance with relevant legislation.
- Reviewing serious allegations and safeguarding matters.
- Supporting external investigations where required.

Registered Manager

The Registered Manager is responsible for:

- Implementing this policy.
- Managing safeguarding concerns.
- Liaising with external agencies.
- Supporting investigations.
- Monitoring employee awareness and compliance.
- Ensuring concerns are escalated appropriately.

Care Coordinators and Assessors

Care Coordinators and Assessors are responsible for:

- Remaining alert to warning signs.
- Escalating concerns immediately.
- Supporting safeguarding processes.
- Recording relevant information accurately.

Live-In Carers

Live-In Carers are responsible for:

- Remaining vigilant.
- Reporting concerns promptly.
- Supporting the welfare of service users.
- Following safeguarding procedures.

All Employees

All employees must:

Follow this policy.

- Report concerns immediately.
- Participate in training.
- Support investigations where required.

- Promote a culture of safeguarding and awareness.

6. Procedure

6.1 Recognising Indicators of Modern Slavery

Employees should remain alert to situations where a person may be experiencing exploitation.

Indicators may include:

- Fearful, anxious, or withdrawn behaviour.
- Signs of physical abuse or neglect.
- Limited freedom of movement.
- Inability to speak freely.
- Someone speaking on the person's behalf at all times.
- Unexplained injuries.
- Poor living conditions.
- Restricted access to money or personal documents.
- Long working hours without appropriate pay.
- Dependence upon another person for basic needs.
- Evidence of coercion, intimidation, threats or control.

The presence of one indicator does not automatically mean modern slavery is occurring; however, concerns should always be considered carefully.

6.2 Risks within Health and Social Care

Modern slavery can affect:

- Service users.
- Family members.
- Employees.
- Agency workers.
- Domestic staff.
- Migrant workers.
- Vulnerable adults.

Employees should remain aware that individuals receiving care may themselves be victims of exploitation or may be exposed to exploitative situations.

6.3 Safe Recruitment Practices

Medicare People is committed to ethical recruitment and employment practices.

Recruitment processes include:

- Right-to-work verification.
- Identity checks.

- Employment history verification.
- Disclosure and Barring Service (DBS) checks where appropriate.
- Reference checks.
- Direct engagement with applicants.

Employees will always retain control of their own:

- Identification documents.
- Passport.
- Bank account.
- Employment arrangements.

The organisation will never knowingly participate in exploitative employment practices.

6.4 Responding to Concerns

Where modern slavery is suspected, employees should:

- Remain calm.
- Prioritise the safety of the individual.
- Record factual observations.
- Avoid confronting suspected perpetrators.
- Avoid conducting their own investigation.
- Report concerns immediately to the Registered Manager.

Immediate action should be taken where there is a risk of serious harm.

6.5 Recording Concerns

Any concerns should be recorded as soon as possible.

Records should include:

- Date and time.
- Individuals involved.
- Factual observations.
- Actions taken.
- Relevant conversations.
- Other supporting information.

Records must be accurate and objective.

6.6 Reporting and Escalation

Concerns should be reported immediately to the Registered Manager.

The Registered Manager will determine whether further action is required, including referrals to:

- The Local Authority Safeguarding Team.
- The Police.
- The Modern Slavery Helpline.

- The Care Quality Commission.
- Other relevant agencies.

Employees must never ignore or delay reporting concerns.

6.7 Supporting Individuals at Risk

Where an individual may be experiencing modern slavery or exploitation, Medicare People will:

- Prioritise their safety and wellbeing.
- Follow safeguarding procedures.
- Support access to appropriate services.
- Work with relevant statutory agencies.
- Maintain confidentiality where appropriate.

The individual's wishes and views should be considered wherever possible.

6.8 Concerns Regarding Employees or Recruitment

Any concerns regarding:

- Employee exploitation.
- Forced labour.
- Recruitment malpractice.
- Document retention.
- Wage concerns.
- Coercive employment practices.

must be reported immediately.

Appropriate investigations will be undertaken and external agencies informed where necessary.

6.9 Whistleblowing

Employees may report concerns through the Whistleblowing Policy where they feel unable to raise concerns through normal management channels.

Employees raising genuine concerns in good faith will be protected from victimisation and retaliation.

6.10 Learning and Continuous Improvement

Following incidents, investigations or safeguarding concerns, Medicare People will review:

- Lessons learned.
- Recruitment practices.
- Safeguarding arrangements.
- Training needs.
- Policy effectiveness.

Improvements will be implemented where required.

7. Records and Documentation

The following records may be maintained:

- Safeguarding records.
- Incident reports.
- Referral records.
- Investigation reports.
- Recruitment records.
- Training records.
- Audit records.
- Action plans.
- Professional correspondence.

Records must be accurate, up to date and stored securely.

8. Training and Competency

Employees will receive training and guidance covering:

- Modern slavery awareness.
- Human trafficking indicators.
- Exploitation and coercion.
- Safeguarding responsibilities.
- Reporting concerns.
- Professional boundaries.
- Whistleblowing.

Competency will be monitored through:

- Supervision.
- Audits.
- Training assessments.
- Appraisals.
- Incident reviews.

Refresher training will be provided regularly.

9. Monitoring and Governance

The Registered Manager will monitor compliance through:

- Safeguarding audits.
- Incident reviews.
- Recruitment audits.

- Training compliance monitoring.
- Quality assurance reviews.
- Whistleblowing trends.

Key Performance Indicators may include:

- Training compliance rates.
- Safeguarding referrals.
- Audit outcomes.
- Completion of corrective actions.
- Investigation outcomes.

Learning identified through audits, incidents and safeguarding activity will be used to strengthen prevention and awareness arrangements.

10. Related Policies

- Safeguarding Adults Policy and Procedure
- Safeguarding Children Policy and Procedure
- Recruitment and Selection Policy and Procedure
- Whistleblowing Policy and Procedure
- Equality, Diversity and Human Rights Policy and Procedure
- Staff Supervision, Appraisal and Competency Policy and Procedure
- Incident Reporting Policy and Procedure
- Lone Working Policy and Procedure
- Service User Property, Finances and Gifts Policy and Procedure
- Quality Assurance Policy and Procedure

11. Review and Version Control

This policy will be reviewed annually or sooner following:

- Changes in legislation.
- Changes in safeguarding guidance.
- Serious incidents.
- Audit findings.
- Regulatory updates.
- CQC inspection outcomes.

Approved By: Stuart Wells

Position: Managing Director

Date: 07/07/2026

Medicare People currently provides introductory live-in care services. We have submitted our application to the Care Quality Commission (CQC) and intend to introduce a fully managed live-in care service following registration.