

# Modern Slavery and Human Trafficking Statement



(Financial Year Ending March 2018)

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps that the Somerset Care Group (Somerset Care Ltd., Somerset Care Support Services, Somerset Care at Home, Acacia Training and Development, and Acacia Facilities Management) have taken to ensure that modern slavery and human trafficking is not taking place in any part of the service we provide, or our supply chain.

## ORGANISATIONAL STRUCTURE

Somerset Care is an award winning not-for-profit care provider situated in the South West of England. Somerset Care has 27 residential and nursing care homes across Somerset and the Isle of Wight, with a community care service providing circa 12,000 weekly hours of support to people in their own homes every week across Somerset, Wiltshire, Bath and North East Somerset, Hampshire, and Surrey.

Somerset Care also has an award-winning 'Petals' dementia service, a 'Realise' service providing support for individuals with learning disabilities, and a training company (Acacia Training and Development) which provides in-house training to staff, as well as external training to companies and individual learners across the South West.

## OUR SUPPLIERS

Our supply chain features various suppliers covering all aspects of the service and care we provide, for example, procurement of agency staff, medical consumables, facilities maintenance, utilities, and waste management. The breadth and complexity of the care supply chain makes it challenging to effectively manage issues beyond an internal level. Respecting human rights of those involved in our supply chain is ultimately our suppliers' responsibility. However, as customers, we play an active role in provider development and when contracting suppliers clearly communicate our expectations.

## OUR COMMITMENT TO PREVENTING MODERN SLAVERY AND HUMAN TRAFFICKING

We are committed to ensure that no forms of modern slavery or human trafficking occur in any part of our business or supply chains.

We undertake all reasonable and practical steps to ensure that our standards are implemented and that local legislation and regulations are being complied with, both throughout our business, and within our direct supply chain.

We will only work with those parties who fully comply with these standards and will deal with issues of non-compliance on a case by case basis.

The Somerset Care Group has an extensive and robust framework of policies, procedures, and contractual requirements in place which should already contribute towards the prevention of slavery and human trafficking within our organisations or supply chains. These include, but are not limited to, areas such as property management, risk management, safeguarding, health and safety, recruitment, whistleblowing, procurement, terms and conditions and codes of conduct for staff, suppliers and contractors, as well as stringent and extensive due diligence and checks when recruiting staff or engaging suppliers or contractors. In particular we:

- Follow robust recruitment procedures, and highlight systems in place to encourage all staff to report concerns internally (with the protection of the Company Policies covering confidential reporting and whistleblowing);
- Ensure modern slavery and other forms of abuse are covered within our Safeguarding Policy and associated documents. This document reflects our commitment to avoiding abuse and ensures our customers are protected;
- Provide staff with mandatory training during induction (with periodic refresher training) which highlights the importance of raising any concerns and what to do if any suspicions are raised, as well as how staff can act to support individuals both within and outside of our service;
- Have robust staff disciplinary procedures to ensure staff expectations are met, with all incidents of staff misconduct investigated in the appropriate manner;
- Build longstanding relationships with external suppliers, where possible, to ensure commitment and make clear our expectations of business behaviour;
- Engage external providers and suppliers which have their own policies and procedures aimed at preventing modern slavery and human trafficking.

## ENFORCING OUR VALUES

The Somerset Care Group has zero-tolerance to any forms of slavery or human trafficking. We expect our suppliers, providers, and all of our staff to adhere to our values at all times. Somerset Care follows the ethos of the three-Cs (Customers, Care, and Candour).

Our Procurement Policy, process and procedures clearly lays out and incorporates the relevant due diligence checks we will conduct with suppliers before entering into contracts.

As part of the Group's ongoing change program we may also review or reconsider additional policies, procedures or requirements if appropriate to ensure there is no slavery or human trafficking taking place in our group or in our supply chains.

## EFFECTIVENESS IN COMBATING MODERN SLAVERY AND TRAFFICKING

The Somerset Care Group uses the following methods to ensure that modern slavery and human trafficking is not taking place within any part of our business.

These also act as performance indicators to ensure due diligence and to measure how effective we have been in this task:

- In house audits of our homes and community services by a dedicated Quality and Performance Team;
- Self-assessment work-books to ensure expectations are being met and that our customers are receiving a safe and effective service;
- Work-force monitoring by Managers and effective payroll systems;
- Staff and customer feedback questionnaires;
- A level of communication and contact between all parts of our service, as well as external suppliers to ensure our expectations are met.

As a registered care provider, Somerset Care also receives periodic external inspections from the Care Quality Commission (CQC). These inspections are largely unannounced and rate our services based on the five key performance indicators of safe, effective, caring, responsive, and well-led. This statement will be reviewed and updated as appropriate and at least annually.

Gary Ridewood  
Finance Director and Interim Chief Executive Officer  
November 2018

