

## Modern Slavery Statement, Policy & Guidance

The term Capstone Group is used throughout this policy to indicate that the policy will be stored, accessed and referred to by all Registrations belonging to the Capstone Group; Capstone Foster Care North, Midlands, South East and South West, Excel Fostering and FosterCare UK.

### Version History

Version	Date	Amendment
V2	01/09/2023	Review
V1	04/11/2021	Policy developed

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### 1. Legislation & Guidance

- The Modern Slavery Act 2015 (Sec 54)
- The Human Rights Act 1988
- The UN Convention on the Right of the Child 1989

### 2. Introduction

This statement, policy & guidance applies to all individuals working for the Capstone Group or on the company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

It is made in accordance with section 54(1) of the Modern Slavery Act 2015 and sets out the groups' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

The Capstone group has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of our business dealings and relationships.

### 3. Policy and Guidance

#### Implementation and responsibilities:

The Capstone group directors and senior management have the overarching responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the group.



All employees are collectively and personally responsible for the communication, understanding and practical application of this policy. Line managers should ensure that staff members are aware of this policy and any subsequent revisions.

The Capstone group services are subject to rigorous statutory regulations with compliance measured and audited by Ofsted and Local Authority Commissioning Teams.

This policy statement and guidance will be made available on our website, to all employees on the group intranet, and to our supply chain and to any other interested parties upon request.

## Definitions

**Modern Slavery** - the recruitment, movement, harbouring or receiving of children, or adults through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

**Human Trafficking** - the action or practice of illegally transporting people from one country or area to another, typically for the purposes of forced labour or sexual exploitation.

## Modern Slavery Policy

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

The Capstone group is committed to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Capstone group expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will, in turn, hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse, and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Capstone group accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

Our permanent employees are recruited directly by our own in-house recruitment resources. Due to the nature of children's services our recruitment processes are strict and comply fully with regulatory guidelines and safer recruitment for those working with children, and vulnerable adults.

The Capstone group encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Employees are encouraged to speak up about unethical behaviour, wrongdoing or behaviours they think go against our policies and values.

Direct access to our Group CEO and awareness of whistleblowing policies supports this communication. Every employee is also given membership of FOSTERTALK who provide access to resources and support.

Staff are also advised of the resources available on [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org) and the supporting helpline number: 08000 121 700.

## **Our Supply Chain**

Due to the nature of our sector, our supply chain is rationalised wherever possible.

It is expected that our suppliers are able to provide details of their own policies supporting their anti-slavery statements and, as a minimum, meet national laws and include human rights principles regarding child labour and bonded or forced labour.

Throughout our supply chain, we are committed to high ethical standards, promoting safe and fair working conditions and responsible management of social issues. We believe we have a responsibility and opportunity to encourage sustainable business practices as well as inclusion and diversity amongst our suppliers. Our supply chains include contractors and consultants who provide various products and services such as:

- Social work and therapeutic/ clinical services.
- Occupational health and HR legal providers.
- Information technology suppliers providing equipment such as computers, laptops and mobile phones as well as software and on-line training.
- Facilities management such as cleaning and security services.
- Marketing services.
- Suppliers of materials such as stationery and office equipment.

As a Group, we have a number of safeguards in place to ensure that we do not support any wrongful practices these include;

- Promoting transparent, and open reporting.
- Making agencies aware of our safer recruitment practices.



- Ensuring that the correct checks are carried out.

Where the Group is made aware of any contradictions to these practices, it would look to immediately disengage with the service. All reports will be fully investigated, and appropriate remedial actions taken and we will work closely with local authorities in ensuring our safeguarding policies and procedures dovetail with local procedures and best practice.

### **Due diligence**

The Capstone group have robust recruitment processes, which include undertaking document checks on candidates prior to employment to evidence they are allowed to work in the UK, performing appropriate reference checks and ensuring that staff are paid directly into a suitable personal bank account.

**Employee Code of Conduct:** The Company's code makes clear to employees the actions and behaviours expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating in the UK and managing its supply chains.

**Recruitment/ Agency Workers Directive Policy:** The company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

### **Responsibilities for compliance**

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, is the responsibility of all those working for the Capstone group or under the groups control. All staff are required to avoid any activity that might lead to a breach of this policy.

If any staff member believes or suspects a breach of or conflict with this policy has occurred or may occur, they must notify their line manager or report it in accordance with their duty of care under the modern slavery act. Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the groups business or supply chains as soon as possible. If there is any uncertainty about whether a particular act, the treatment of workers or their working conditions within any of the groups supply chains constitutes any of the various forms of modern slavery, it should be raised with a line manager.

The government's Modern Anti-Slavery and Human Trafficking Slavery Helpline can also be contacted on 0800 0121 700 for further information and guidance on modern slavery.

If a specific case of modern slavery is identified here in the UK, it should be reported to the police immediately on 101. If potential victims are in immediate danger the standard 999 emergency number should be used. In the UK, mechanisms are in place to assist victims of slavery and human trafficking. If staff identify a potential victim they can be referred (with consent) to the National Referral Mechanism to be formally identified as a victim of modern slavery and offered Government-funded support.



668 781 (for male potential victims of human trafficking)

Women's Aid 028 9024 9041 (for female potential victims of human trafficking)

We recognise that overall accountability for risk management and internal controls are the responsibility of the Board. All risks that are identified as extreme or high risk will be escalated to regional risk committee and subsequently reported to Board.

### **Training and Communication**

Access to information and resources around modern slavery are made available to staff during their induction and situated on the INTRANET so that employees can access this throughout their employment.

[Modern slavery training: resource page - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

The Capstone group zero-tolerance approach to modern slavery is communicated via this policy which is situated on the INTRANET for internal staff members and contractors and our INTERNET for external contractors, suppliers and providers.

### **Breach of Policy**

Breaches of this policy by employees, will be followed by disciplinary action which may lead to summary dismissal for gross misconduct. The company may also terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

### **UK Modern Slavery Adult Victim support providers**

- England and Wales - The Salvation Army - 0300 303 8151
- Modern Slavery Helpline - the NGO Unseen operates a UK-wide 24/7 Modern Slavery Helpline that victims, employers and members of the public who may encounter modern slavery can call for expert support and advice on 08000 121 700.

### **Further information**

- UK Government Modern Slavery Webpage [www.gov.uk/government/collections/modern-slavery](http://www.gov.uk/government/collections/modern-slavery)
- Modern Slavery Act 2015 [www.legislation.gov.uk/ukpga/2015/30/contents/enacted](http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted)
- The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 [www.legislation.gov.uk/ukdsi/2015/9780111138847](http://www.legislation.gov.uk/ukdsi/2015/9780111138847)
- Transparency in Supply Chains Consultation Document and Government Response [www.gov.uk/government/consultations/modern-slavery-and-supply-chains](http://www.gov.uk/government/consultations/modern-slavery-and-supply-chains)
- Anti-Slavery Commissioner [www.antislaverycommissioner.co.uk/](http://www.antislaverycommissioner.co.uk/)
- Alliance 8.7 [www.alliance87.org/](http://www.alliance87.org/)

#### 4. Related Policies and Documents

This policy does not operate in isolation and should be read in conjunction with related group policies and documentation, such as:

- Safer Recruitment, Whistleblowing and Grievance Policies.
- Risk Management Policy – clarifying the process for identifying, analysing and evaluating risk.
- Safeguarding Policy – ensuring that vulnerable people are not at risk.
- Health and Safety Policy – demonstrating acceptable working conditions.

#### Document Creation & Review Schedule

<b>Policy Author</b>	Mary Moden
<b>Policy Owner</b>	Director of QA & Service Improvement
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