

# Modern Slavery, Child Labour & Inhumane Treatment Policy

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## Safeguarding Roles and Responsibilities

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## Table of contents

<b>1</b>	<b>Introduction</b>	<b>2</b>
1.1	Policy statement	2
1.2	Status	2
1.3	Training and support	2
<b>2</b>	<b>Scope</b>	<b>2</b>
2.1	Who it applies to	2
2.2	Why and how it applies to them	3
<b>3</b>	<b>Definition of terms</b>	<b>3</b>
3.1	Modern slavery	3
3.2	Human trafficking	3
3.3	Modern Slavery Act 2015	3
3.4	Servitude	3
3.5	Forced or compulsive labour	3
3.6	Female genital mutilation (FGM)	3
3.7	Cuckooing	4
3.8	Honour-based abuse	4
<b>4</b>	<b>Policy</b>	<b>5</b>
4.1	Modern slavery and human trafficking explained	5
4.2	Registration and treatment	5
4.3	Modern slavery and healthcare	6
4.4	Signs of slavery and trafficking	6

4.5	Actions to take in suspected cases	7
5	Other factors to consider	8
5.1	Female genital mutilation	8
5.2	Clinical disengagement	8
5.3	Honour-based abuse	8
6	Training	9
7	Reporting	9
8	Summary	9

## 1 Introduction

### 1.1 Policy statement

Modern slavery (or modern-day slavery) is a human rights violation and has severe consequences for the health and wellbeing of survivors. It is an exploitative crime that impacts on physical and mental health and has public health implications.

This policy serves to inform staff at Inspiring Teaching about modern slavery and the impact it can have on affected patients and the healthcare they receive.

### 1.2 Status

This document and any procedures contained within it are non-contractual and may be modified or withdrawn at any time. For the avoidance of doubt, it does not form part of your contract of employment.

### 1.3 Training and support

CareJoy will provide guidance and support to applicable staff to understand their rights and responsibilities under this policy. Additional support will be provided to managers and supervisors.

## 2 Scope

### 2.1 Who it applies to

This document applies to all employees, partners and directors of the organisation. Other individuals performing functions in relation to the organisation such as agency workers, locums and contractors are encouraged to use it.

## 2.2 Why and how it applies to them

Staff at Inspiring Teaching must be aware that modern slavery and human trafficking exist within many communities nationally. As such, all staff must be aware of signs that could indicate modern slavery and know how to support those affected.

The organisation aims to design and implement policies and procedures that meet the diverse needs of our service and workforce, ensuring that none are placed at a disadvantage over others, in accordance with the Equality Act 2010. Consideration has been given to the impact this policy might have with regard to the individual protected characteristics of those to whom it applies.

## 3. Definition of terms

### 3.1 Modern slavery

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.<sup>1</sup>

### 3.2 Human trafficking

This is the movement of people by means such as force, fraud, coercion or deception with the aim of exploiting them. It is a form of modern slavery.<sup>2</sup>

### 3.3 Modern Slavery Act 2015

The Modern Slavery Act gives law enforcement the tools to fight modern slavery and to ensure perpetrators can receive suitably severe punishments for these crimes and also enhances support and protection for victims.

### 3.3 Servitude

The obligation to provide services imposed by coercion

### 3.4 Forced or compulsive labour

Involuntary work performed under the menace of a penalty such as violence or intimidation<sup>3</sup>

### 3.5 Female genital mutilation (FGM)

FGM is the partial or total removal of the external female genitalia. The female genitals are deliberately cut, injured or changed for no medical reason. Whilst it is not widely considered as a form of human trafficking, it may be an indication to consider.

It is also known as female circumcision or cutting.

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<sup>1</sup> [Gov.uk – Modern Slavery](#)

<sup>2</sup> [Unseen – Human Trafficking](#)

<sup>3</sup> [International Labour Organization – Forced Labour](#)

### 3.6 Cuckooing

Cuckooing is when professional criminals take over a vulnerable adult's home for criminal activities. Cuckooing is commonly associated with drug dealing.

These criminals are very selective about who they target as 'cuckoo' victims and are often entrepreneurial.

Victims of cuckooing are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single mothers and those living in poverty.<sup>4</sup> Victims may suffer from other forms of addiction such as alcoholism and are often already known to the police. Dealers often approach the victim offering free drugs in exchange for using their home.

Cuckooing increases the risk of domestic abuse, sexual exploitation and violence. Children as well as adults may be used as drug runners.

Gangs are generally known to access several addresses, moving quickly between vulnerable people's homes for just a few hours, a couple of days or sometimes longer. This helps gangs to evade detection so they can operate from a discreet property, out of sight, under the police radar. These gangs may use accommodation in rural areas including serviced apartments, holiday lets, budget hotels and caravan parks.

Manchester Safeguarding Partnership states that when the criminals use the victim's property for criminal enterprises, the inhabitants become terrified of going to the police for fear of being suspected of involvement in drug dealing or being identified as a member of the group which would result in their eviction from the property. Some vulnerable adults may be forced to leave their homes, making themselves homeless and leaving the gangs free to sell drugs in their absence.

The BBC article titled 'Cuckooing': When drug gangs take over your own home provides a good insight into this issue.

### 3.7 Honour-based abuse

The Crown Prosecution Service describes honour-based abuse as<sup>5</sup>

*"An incident or crime involving violence, threats of violence, intimidation coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may have been committed to protect or defend the honour of an individual, family and/or community for alleged or perceived breaches of the family and/or community's code of behaviour."*

Women are predominantly (but not exclusively) the victims and this can be distinguished from other forms of violence as it is often committed with some degree of approval and/or collusion from family and/or community members. Males can also be victims, sometimes as a consequence of their involvement in what is deemed to be an inappropriate relationship, if they are gay or if they are believed to be supporting the victim.

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<sup>4</sup> [Crimestoppers – Stop Cuckooing](#)

<sup>5</sup> [CPS – Honour based abuse](#)

Honour based abuse cuts across all cultures, nationalities, faith groups and communities, usually where a culture is heavily male dominated. Relatives may conspire, aid, abet or participate in honour-based abuse for what might seem to be a trivial transgression.<sup>6</sup>

## 4. Policy

### 4.1 Modern slavery and human trafficking explained

Slavery is an umbrella term for activities when one person obtains or holds another person in compelled service. Someone is in slavery if they are:

- Forced to work through mental or physical threat
- Owned or controlled by an 'employer' usually through mental or physical abuse or the threat of abuse
- Dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or have restrictions placed on his/her freedom

Human trafficking is a form of modern slavery and concerns the recruitment, transportation, transfer, harbouring or receipt of people. This is recognised as possibly being for the purposes of exploitation which includes (but this list is not exhaustive):

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage, such as being forced to work to pay off debts that realistically they never will be able to

### 4.2 Registration and treatment

Asylum seekers, refugees and migrants face many of the same health problems as the UK population. In addition, they may<sup>7</sup>:

- Have poor awareness of the NHS and fear barriers to accessing treatment
- Come from countries of origin with poor healthcare
- Suffer health impacts (mental and physical) after leaving their country and being detained in the UK
- Have experienced war, conflict or torture
- Be separated from family, have poor housing and be socially isolated

Such patients are entitled to free treatment from the NHS and practices have a contractual duty to provide emergency and immediately necessary treatment.

This organisation ensures that:

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<sup>6</sup> [Bedfordshire Police](#)

<sup>7</sup> [CQC GP Mythbuster No 36](#)

- It does not refuse to register someone because of any protected characteristic under the Equality Act 2010
- It does not refuse to register someone on other grounds such as social class, appearance or medical condition
- It registers patients without requiring any documentation. Overseas visitors do not need to provide proof of identity or immigration status although asylum seekers may have an application registration card (ARC) from Immigration Services
- It registers asylum seekers and refugees who are not in permanent housing as a temporary patient for up to three months

### 4.3 Modern slavery and healthcare

The Safeguarding Policy is to be referred to and gives further details on how to raise a concern, the recording and sharing of information<sup>8</sup>, consent and confidentiality.

In all cases, whether adult or child, clinicians are encouraged to act on their instincts if they think that something is 'not right'. There may be a pattern of signs or symptoms that could alert the clinician such as a combination of triggers or an inconsistent story or history.

It is important to remember that:

- Trafficked people may not self-identify as victims of modern slavery
- Trafficking victims can be prevented from revealing their experience to healthcare staff from fear, shame, language barriers and a lack of opportunity to do so. It can take time for a person to feel safe enough to 'open up'
- There is a need to be cautious regarding age and the following rule is to be adopted:
  - If a person states they are under 18, or if a person says they are an adult although there is a suspicion they are not, the patient should be treated as if they were under 18 years old.

In all cases, safeguarding principles should be considered and the Safeguarding Policy is to be consulted.

### 4.4 Signs of slavery and trafficking

Victims of modern slavery may only come to the attention of staff when seriously ill or injured or with an injury or illness that has been left untreated for a while. Healthcare issues may include<sup>9</sup>:

- Evidence of long-term multiple injuries
- Indications of mental, physical or sexual trauma
- Sexually transmitted infections

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<sup>8</sup> [Gov.uk – Information Sharing](#)

<sup>9</sup> [Gov.uk – Guidance for Healthcare Staff](#)

- Pregnant, or a late booking over 24 weeks for maternity care
- Disordered eating or poor nutrition
- Evidence of self-harm
- Dental pain
- Fatigue
- Non-specific symptoms of post-traumatic stress disorder
- Symptoms of psychiatric and psychological distress
- Back pain, stomach pain, skin problems, headaches and dizzy spells

Signs of trafficking should also be considered and these can include the following if a person:

- Is accompanied by someone who appears controlling, who insists on giving information and coming to see the clinician
- Is withdrawn and submissive, seems afraid to speak to a person in authority and the accompanying person speaks for them
- Gives vague and inconsistent explanations of where they live, their employment or schooling
- Has old or serious injuries left untreated
- Either gives vague information or is reluctant to explain how the injury occurred or to give a medical history
- Is not registered with a GP, nursery or school
- Has a lack of official documents
- Has experienced being moved locally, regionally, nationally or internationally
- Appears to be moving location frequently
- Presents an appearance that suggests general physical neglect
- Has no official means of identification or presents suspicious looking documents

#### 4.5 Actions to take in suspected cases

Should the clinician or member of staff have suspicions about slavery or trafficking, they are encouraged to try to find out more about the situation and speak to the person in private without anyone who accompanied them to the premises.

A victim of human trafficking is unlikely to open up initially due to lack of trust. They need to be reassured that they are in a safe space allowing for them to talk. It may take a number of meetings before the person opens up so be prepared to make follow up appointments.

Staff should not be concerned about challenging cultural beliefs and should not let these stand in the way of making informed assessments about the safety of a child, young person or adult.

As before, the Safeguarding Policy should be considered for further guidance. Additionally, advice may be sought from colleagues and the safeguarding lead.

In all cases, staff should:

- Be trauma-informed in their approach. Be sensitive to the possible indications of trauma e.g., hyper vigilance, mistrust, anxiety, numbing and a dissociative state. Respond non-judgementally and reassuringly
- Not rush the consultation. The victim may have some cognitive impairment as a consequence of the abuse and may find it difficult to remember details or make decisions

- Be sensitive to possible fear of contact with statutory agencies - the victim may have been told that they will be deported
- Avoid calling authorities such as police or immigration services unless they have the informed consent of the patient or where the threat of danger to the patient or others is such that they need to do so
- Not raise the slavery or trafficking concerns with anyone accompanying the child or adult
- Ensure the healthcare needs of the individual are addressed, treatment is provided and referrals made where necessary

## 5. Other factors to consider

### 5.1 Female genital mutilation

Whilst not listed as a particular sign of slavery or trafficking, recognition of FGM within some cultures should lead to a wider consideration of the environment in which some women live as circumstances may be such that could be considered under the modern slavery umbrella.

Further information can be found within the [FGM Policy](#).

### 5.2 Clinical disengagement

Whilst there are simple reasons for some patients to not show up for an appointment, consideration of modern slavery should be considered for those who repeatedly DNA or become disengaged with their own healthcare.

Disengaged patients are often:

- Vulnerable adults or children
- Patients with a mental health diagnosis or learning difficulty
- The elderly
- Those who would ordinarily be brought to their appointment
- Patients connected to the safeguarding register
- Patients on the DNAR or palliative care registers
- Those patients who the organisation have concerns about

The above list could be associated with modern slavery.

Refer to the [Clinical Disengagement Policy](#).

### 5.3 Honour-based abuse

One of the most common examples of honour-based abuse is forced marriage with victims often suffering the conditions of slavery through domestic servitude.



Staff are to raise concerns any accordingly with the safeguarding lead and/or seek advice from the Safeguarding Policy.

## 6. Training

As part of annual training commitments, staff at Inspiring Teaching receive in-house training on the recognition, reporting and recording of all patients suspected as being victims of modern slavery or trafficking or associated safeguarding concerns.

The following training materials are used during this training:

- a. The Department of Health's e-learning tool for health service staff on identifying and responding to Modern Slavery
- b. The Gangmasters and Labour Abuse Authority (GLAA) defines methods used by traffickers to exploit their victims and includes victims' accounts.
- c. The Government's Modern Slavery Awareness Booklet provides detailed information for staff working within the public sector.

## 7. Reporting

Staff who suspect that a patient may have been trafficked can contact the 24-hour confidential helpline. This is maintained by the Salvation Army and provides professional advice and support on **0300 303 8151**.

Staff may also report cases by the following means:

- Phoning **999** if it is felt that there is an immediate risk of harm
- Reporting to the police on **101**
- Calling the Modern Slavery Helpline on **08000 121 700** if there is not an immediate risk of harm

## 8. Summary

Modern slavery and trafficking is more prevalent than people may first consider.

With correct training and information, Inspiring Teaching has taken steps to inform and empower staff to assess and act upon suspected cases.