



Human Resources

Modern Slavery and Human Trafficking Statement

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Purpose

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Independence Matters CIC has taken to ensure that slavery and human trafficking are not taking place within its supply chains or in any part of its business. This statement relates to actions and activities during the financial year 1 April 2022 to 31 March 2023.

Scope

This policy applies to Independence Matters CIC and its subsidiary, Home Support Matters CIC. Collectively known as the “IM Group.” This policy applies to all persons working for, or on behalf of the IM Group in any capacity. This includes but does not limit the policy applicability to, colleagues, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives, and business partners.

Statement

Introduction from Sarah Stock, Managing Director

As part of the Health & Social Care Sector, the IM Group recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking.

Modern slavery and human trafficking can take place in a wide range of employment sectors, including health and social care. People using health and social care services may also be victims of modern slavery or human trafficking. Health and social care organisations also have a role in identifying victims of modern slavery and human trafficking who come to them for care or support.

Modern slavery and human trafficking are incompatible with the values, beliefs, and commitment of the IM Group, 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 as a large organisation that employs more than 700 colleagues.

We are not legally obliged to publish a statement on modern slavery and human trafficking under the Modern Slavery Act 2015, however, as an organisation primarily funded by the Government, we are legally required to operate in ways that are compatible with the Human Rights Act 1998. The rights under this Act include the right for people to be free from slavery and forced labour under

Article 4.i. We also have a duty to report criminal activity. Publishing this statement – and taking the actions contained within it – helps us to fulfil these duties.

Organisational structure and supply chains

This statement covers the activities of Independence Matters CIC, its subsidiary, Home Support Matters CIC. The ultimate holding company of Independence Matters CIC is Norfolk County Council.

Independence Matters CIC provides support opportunities across the whole of Norfolk, both in the home and in the community for adults with learning disabilities, young people in transition and those living with dementia.

Home Support Matters CIC delivers a wide range of home and specialist care services across Norfolk and the Waveney Valley region of Suffolk, providing support for people with disabilities, reablement care for those recovering from illness or injury, care for the elderly, crisis support and flexible support for people with dementia.

Independence Matters CIC and Home Support Matters CIC are registered within England and Wales and operate within England.

Our Supply Chains

Our supply chains include:

- Agency staff
- Specialist professionals
- Contractors, agency staff
- Cleaning products
- Raw food grade materials for manufacturing pet bedding
- Recycled newsprint paper
- Cotton and j-cloth waste products
- ICT Hardware and Software
- Office equipment and furniture
- PPE, workwear, and uniforms
- Stationery, books, publications, periodicals
- Vehicles

We review our supply chains to evaluate human trafficking and slavery risks and we engage with suppliers to review all aspects of the supply chain including safety human trafficking, child labour and other legal requirements.

Responsibility

Primary responsibility for the measures which the IM Group has implemented and continues to enhance and evolve to eradicate modern slavery and human trafficking lies with the Board, however it is a collective responsibility of all colleagues, customers and carers to be alert to the risks, however small, in our business and in the wider supply chain.

Our Policies on Slavery and Human Trafficking policies

The organisation operates the following policies which are reviewed annually and describe its approach in the identification of modern slavery and human trafficking risks, and which support our efforts in removing the potential for slavery and human trafficking within any part of its operations or our supply chains. These policies are published on our Intranet (which is accessible by all employees):

- Whistleblowing policy: protecting whistle blowers through our confidential reporting process;
- Harassment policy: prohibiting harassment and intimidation;
- Disciplinary policy: prohibiting any threat of violence; and
- Safeguarding policy: protecting from harm and promoting the wellbeing of young people and vulnerable adults.

Risk Assessment and Due Diligence

The risk of slavery and human trafficking within our organisation is substantially avoided due to our policies and procedures. By building long standing relationships with our suppliers we aim to mitigate risks. Our non-payroll spend comprises less than 10% of our annual cost base, but we minimise the number of suppliers with whom we engage directly, asking them to ensure that they have a Modern Slavery and human trafficking policy or have adequate procedures in place to identify and prevent modern slavery and human trafficking within their own supply chains and adhere to IM Group core values.

Contract works relating to property and facilities management are procured via Norse Group which is wholly owned by Norfolk County Council, who themselves have a robust modern slavery and human trafficking policy which it applies to all its staff and approved contractors.

Supplier Adherence

We have zero tolerance to slavery and human trafficking within our supply chains and we expect all those within our supply chains to comply with our values.

Ongoing Due Diligence

As part of its ongoing due diligence, IM will:

- provide ongoing training on slavery and human trafficking risks and the requirements of the Modern Slavery Act 2015 to all teams within the IM Group, but in particular those undertaking procurement activities;
- exercise continued due diligence of our supply chain to ensure our suppliers continue to maintain robust policies and procedures regarding the Modern Slavery Act 2015;
- contract only with key suppliers that can demonstrate they behave in a manner that is consistent with our own core values and have zero tolerance to slavery and human trafficking.

Enforcement of this Statement

Independence Matters Group will review this statement annually.

This statement was approved by Independence Matters CIC Board on 16 November 2023.

Karen Hester
Chair, Independence Matters CIC

Karen Hester

