

Modern Slavery and Human Trafficking Policy and Procedure



The below are the underpinning sources to ensure that the policy is current

- Author: HM Government: Home Office, (2022), Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland. [Online] Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115555/Statutory_Guidance_SNI_v1.03_.pdf [Accessed: 16/8/2022]
- Author: HM GOVERNMENT, (2022), National referral mechanism guidance: adult (Northern Ireland and Scotland). [Online] Available from: <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/national-referral-mechanism-guidance-adult-northern-ireland-and-scotland> [Accessed: 16/8/2022]
- Author: Human Trafficking Foundation, (2018), Human Trafficking Foundation Policy - Improving Victim Support. [Online] Available from: <https://www.humantraffickingfoundation.org/policy> [Accessed: 16/8/2022]
- Author: UK Government Modern Slavery Statement, (2021), UK government modern slavery statement. [Online] Available from: <https://www.gov.uk/government/publications/uk-government-modern-slavery-statement> [Accessed: 16/8/2022]
- Author: HM Government, (2021), Publish an annual modern slavery statement. [Online] Available from: <https://www.gov.uk/government/publications/coronavirus-covid-19-reporting-modern-slavery-for-businesses/modern-slavery-reporting-during-the-coronavirus-covid-19-pandemic> [Accessed: 16/8/2022]
- Author: Salvation Army, (2020), Modern slavery. [Online] Available from: <https://www.salvationarmy.org.uk/modern-slavery> [Accessed: 16/8/2022]
- Author: HM Government, (2022), National referral mechanism guidance: adult (England and Wales). [Online] Available from: <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales> [Accessed: 16/8/2022]
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- Author: HM Government, (2021), Slavery and human trafficking in supply chains: guidance for businesses. [Online] Available from: <https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide> [Accessed: 16/8/2022]
- Author: HM Government, (2015), Modern Slavery Act 2015. [Online] Available from: <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted> [Accessed: 16/8/2022]
- Author: HM Government: Home Office, (2021), Independent review of the Modern Slavery Act: final report. [Online] Available from: <https://www.gov.uk/government/publications/independent-review-of-the-modern-slavery-act-final-report> [Accessed: 16/8/2022]

1. Purpose

Modern Slavery and Human Trafficking Policy and Procedure



1.1 To ensure that everyone at Xander Recruitment Group is aware of the Modern Slavery and Human Trafficking Policy and Procedure and the procedures in place to identify, respond appropriately and be able report in line with local and the national guidance. This policy refers to adults who may be at risk, the procedure for children is detailed in the Safeguarding Children and Child Protection Policy and Procedure.

1.2 This policy must be read alongside our Safeguarding Adults Policy and Procedure. Xander Recruitment Group will ensure that staff understand how to report safeguarding issues to all parties they are required to and that they understand the contracting authorities safeguarding reporting procedures and that these procedures are communicated to all staff.

Other policies that relate to Modern Slavery and Human Trafficking include but are not limited to - Raising Concerns, Freedom to Speak Up and Whistleblowing Policy and Procedure

Safeguarding Children and Child Protection Policy and Procedure, the Recruitment Policy and Procedure, the Right to Work Checks Policy and Procedure and the Agency Staff Policy and Procedure.

1.3 To support Xander Recruitment Group in meeting the following Key Lines of Enquiry/Quality Statements

Key Questions	Key Lines of Enquiry	Quality Statements
Safe	How do Systems, processes and practices keep people safe and safeguarded from abuse?	Safeguarding
Well-Led	Is there a clear vision and credible strategy to deliver high-quality care and support, and promote a positive culture that is person-centred, open, inclusive and empowering, which achieves good outcomes for people?	Shared Direction and culture Capable, compassionate and inclusive leaders
Well-Led	Does the governance framework ensure that responsibilities are clear and that quality performance, risk and regulatory requirements are understood and managed?	Governance, management and sustainability

1.4 To meet the legal requirements of the regulated activities that {Cornerstone Healthcare Group} is registered to provide:

- The Modern Slavery Act 2015
- Health and Safety at Work etc. Act 1974
- Human Rights Act 1998



- The Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012

2. Scope

2.1 The following roles may be affected by this policy:

- All Employees
- Senior Managers
- Other Management

2.2 The following may be affected by this policy:

- Those we provide our services to such as Service Users

2.3 The following stakeholders may be affected by this policy

- Commissioners
- Local Authority
- Contracting Authority
- Clients
- Suppliers

3. Objectives

3.1 To promote awareness of concerns surrounding slavery and human trafficking and promote the commitment of Cornerstone Healthcare Group in addressing slavery and human trafficking in all its forms. An annual statement will be produced, where applicable.

3.2 To ensure that identification, protection, care, and support for victims of modern slavery and human trafficking is at the heart of our safeguarding procedures at Xander Recruitment Group

4. Policy

4.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which include the deprivation of a person's liberty by another to be able to exploit them for personal or commercial gain.

4.2 Xander Recruitment Group has a zero-tolerance policy to modern slavery within the business and supply chains and we are committed to acting ethically and with integrity in all our dealings and relationships.

We will implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in Xander Recruitment Group or within any third parties (agencies) that we are associated with.

4.3 All staff will be made aware of the issues surrounding slavery and human trafficking, whilst being encouraged and supported to raise any concerns to Xander Recruitment Group management.

Xander Recruitment Group will also support any employee that may be subject to slavery or human trafficking.



4.4 Where modern slavery or human trafficking is identified, the Xander Recruitment Group will share information with the appropriate authorities this could be the local Safeguarding Team or the Contracting Authority to safeguard the individual from harm and with the objective of preventing future situations arising, to promote the elimination of routes and sources of slavery or human trafficking.

4.5 All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

4.6 All employees who suspect any members of the workplace being victim of modern slavery must notify their line manager.

4.7 Xander Recruitment Group will take steps to ensure that sufficient communication and employee awareness training is undertaken with regards to Modern Slavery.

4.8 All employees will be made aware of the Xander Recruitment Groups policy on Raising Concerns, Freedom to Speak Up and Whistleblowing Policy.

The purpose of this policy and associated procedure is to enable Xander Recruitment Group to thoroughly investigate allegations of any wrongdoing raised by employees within Xander Recruitment Group without fear of reprisal.

4.9 Xander Recruitment Group will use this policy to underpin and inform any statement on slavery and human trafficking that we may be required to produce to meet the requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

5.1 Reporting Modern Slavery and Human Trafficking Concerns

The following procedure must take place where there are any concerns that someone is a victim of modern slavery or human trafficking. Xander Recruitment Group must ensure that staff are aware that victims of modern slavery or trafficking will often not self-identify. Many will present with a different issue.

- 1) A concern is identified -This could be a Service User as a victim or perpetrator, or a Service User informs us of a concern they have
- 2) If an individual is, or group of people are, in immediate risk of danger or harm, the police must be immediately notified on 999.
- 3) The employee must discuss this with their line manager (where appropriate) and n/a immediately.
- 4) n/a contacts and escalates the concern immediately to Surrey Safeguarding Adults Team.

5.2 Safer Recruitment All staff engaged with providing services at Xander Recruitment Group will be subject to thorough and rigorous recruitment procedures that will include a DBS check, identity check, confirmation of right to work in the UK, employment history, suitability for the role and references. This will minimise the chance of employing a person that has been, or is subject to, slavery or human trafficking. Xander Recruitment Group will follow our - Vetting process Policy and Procedure to ensure that a robust and fair process is followed at all times.



5.3 Xander Recruitment Group will only use employees provided by third-party organisations (such as agencies) that are either registered with the Framework or who can confirm that the staff being supplied are free to work in the UK and meet all the requirements for the role being provided for.

5.4 Training

All staff will undertake training on Modern Slavery and Human Trafficking. This will ensure that they are aware of the indicators of modern slavery which include:

- Individuals not being paid for the work they undertake
- Individuals being held in debt-bondage (being told they “still” owe money after having paid off a previous debt)
- An individual’s passport being held by their “employer” in order to keep the individual at work
- Multiple benefit claimants having their benefits being paid into the same account
- An individual not having the freedom of movement (i.e. passport being taken)
- Clear exploitation of an individual by another for financial or sexual gain
- Shows signs of physical or psychological abuse, look malnourished or unkempt, anxious/agitated or appear withdrawn and neglected. They may have untreated injuries
- Rarely be allowed to travel on their own, seem under the control, the influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work
- Relationships which do not seem right - for example, a young teenager appearing to be the boyfriend/girlfriend of a much older adult
- Be living in dirty, cramped or overcrowded accommodation, and/or living and working at the same address
- Have no identification documents, have few personal possessions and always wear the same clothes day in and day out. What clothes they do wear may not be suitable for their work
- Have little opportunity to move freely and may have had their travel documents retained, e.g. passports
- Be dropped off/collected for work on a regular basis either very early or late at night
- Unusual travel arrangements - children being dropped off/picked up in private cars/taxis at unusual times and in places where it is not clear why they would be there
- Avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family

5.5 Staff will be advised that if they are subject to slavery or human trafficking, if they are aware of any individual that may be subject to slavery or has been trafficked, or if slavery or human trafficking is disclosed to them they must inform the Line Manager of Xander Recruitment Group or the police.

5. Procedure

5.6 Recruitment Risks

Some suppliers may be seeking to recruit additional workers in order to meet increases in demand. Cornerstone Healthcare Group will ensure that rigorous recruitment checks are maintained and that suppliers adhere to the same robust processes to ensure that vulnerable workers are not being exploited by third parties seeking to profit from heightened demand.



5.8 The Health and Safety of Workers

As a responsible organisation, it is important that the relevant local or national government policies are implemented throughout the supply chain at Xander Recruitment Group.

5.9 Risk Assessment

Xander Recruitment Group will undertake a risk assessment of how suppliers are operating to highlight and help identify where there are risks of Modern Slavery or Human Trafficking occurring..

5.10 Review of Effectiveness

Xander Recruitment Group intends to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the supply chains of our providers.

We will use the following KPIs to measure our progress and then start to report the metrics raised from these to ensure these measures are being effective and implement changes as required on an annual basis

- Number of staff trained
- Number of supplier audits completed
- Number of reported concerns and actions taken

We will also continue to:

Support our staff to understand and respond to modern slavery and human trafficking, and the impact that each and every individual working in care can have in keeping present and potential future victims of modern slavery and human trafficking safe

- Gain assurance that all staff at Xander Recruitment Group have access to training on how to identify victims of modern slavery and human trafficking
- Review the Safeguarding Adults Policy and Procedure at Xander Recruitment Group to ensure that Modern Slavery and Human Trafficking are integral within the content and staff are directed to support and advice as needed

5.11 Indicators of Forced Labour

- Individuals may show signs of psychological or physical abuse. They might appear frightened, withdrawn or confused
- Workers may not have free movement and may always be accompanied
- Individuals often lack protective equipment or suitable clothing and have not been trained to safely fulfil the requirements of the role
- The person may not have access to their own documents, such as ID or their passport, with the employer having confiscated them
- Individuals may not have a contract and may not be paid National Minimum Wage or not paid at all



- Workers are forced to stay in accommodation provided by the employer. This accommodation could be overcrowded
- Individuals could live on site
- Workers could be transported to and from work, potentially with multiple people in one vehicle
- The person might not accept money or be afraid to accept payment
- Workers may work particularly long hours

6. Definitions

6.1 Section 52 Modern Slavery Act

- These place a duty on Local Authorities to identify and refer modern slavery child victims and consenting adult victims through the National Referral Mechanism (NRM) This responsibility identifies a local authority as a First Responder. The Council as a first responder (FR) into the NRM process has a duty to notify the Home Office if anyone working within the council identifies a person with indicators suggesting they may be trafficked or enslaved

6.2 Human Trafficking

- Human trafficking is defined as the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation
- It is important not to confuse human trafficking with human smuggling. Human smuggling is also called people smuggling. Human smuggling occurs when an individual seeks the help of a facilitator to enter a country illegally, and the relationship between both parties ends once the transaction ends. Many of those who enter the UK illegally do so by this route. Human smuggling is not a form of modern slavery

6.3 Turnover

- "Turnover" means the amount derived from the provision of goods and services falling within the ordinary activities of the commercial organisation or subsidiary undertaking, after deduction of
- Trade discounts
- Value added tax
- Any other taxes based on the amounts so derived (HM Government - 'Transparency in Supply Chains')

6.4 Modern slavery

- Modern slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment
- Many active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators.



- There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist

6.5 Exploitation (Modern Slavery and Human Trafficking)

- Sexual Exploitation – forced sex work or working in the commercial sex industry (pornography, lap dancing, telephone lines etc.); those manipulated or coerced into sexual activities of any kind for another person's gain
- Modern Slavery – human trafficking; forced labour; domestic servitude; organ harvesting
- Financial Exploitation – debt bondage; finances controlled by others; financial scams; benefit fraud
- Criminal Exploitation – those manipulated or coerced or trafficked for the purpose of any illegal activity i.e., County Lines/drug trafficking; cuckooing (taking over of a person's property); forced street crime (shoplifting, begging etc.); cannabis cultivation
- Cultural Exploitation – those manipulated or coerced using religious, social or cultural beliefs e.g., FGM, radicalisation, forced marriage

Key Facts - Professionals

Professionals providing this service should be aware of the following:

- Where applicable, an annual statement on modern slavery and human trafficking will be published by Xander Recruitment Group on our website and approved by the senior management team e.g. the board of Directors and signed by a Director
- Staff will receive training on Modern Slavery Human Trafficking, and be supported by Xander Recruitment Group if subject to, or reporting of, cases of slavery or human trafficking
- Only staff that have been through robust recruitment procedures will be employed at Xander Recruitment Group
- The Modern Slavery Act 2015 details what organisations need to do about slavery and human trafficking
- If slavery or human trafficking is disclosed to you then this must be shared with the manager at the service, you are working with to Xander Recruitment Group management or the police if someone is in immediate danger
- If there are cases of slavery or human trafficking then you must share this information with Call 08000 121 700 or the police on 101 or contact your local authority as well for further advice

People affected by this service should be aware of the following:

- If you are aware of or become part of any acts of modern slavery or human trafficking, this can be reported to Xander Recruitment Group, and the necessary support will be provided
- You will receive care from staff who have been through robust recruitment

7. Policies in Relation to Modern Slavery

We have implemented the following policies:

Modern Slavery and Human Trafficking Policy and Procedure



- Anti-Slavery and Human Trafficking Policy
- Raise Concerns, Freedom of Speech and Whistleblowing
- Code of Conduct all Employees
- Supplier Code of Ethics

These policies are reviewed annual and are accessible to all employees and suppliers please see the link below to access this policy on our website:

www.xandergroup.co.uk

8. Future Steps

In the next financial year, we aim to:

- Extend training to all employees
- Strengthen supplier engagement and monitoring
- Improve transparency in our supply chain reporting

9. Approval

This statement was approved by the board of directors on the 16th of August 2025 and signed by:

For any modern slavery related concerns, please contact:

Xander Recruitment Group

Designated modern slavery reporting manager: Colin Porter

Email: colin@xandergroup.co.uk

Phone: 0161 6768822

Alex Stockley - Managing Director – XANDER RECRUITMENT GROUP LIMITED

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Further Reading

we recommend that you add to your understanding in this policy area by considering the following materials:

E-learning for Healthcare - Identifying and Supporting Victims of Modern Slavery: <https://www.e-lfh.org.uk/programmes/modern-slavery/>

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Recommended Content for a Modern Slavery Statement: https://corporate-responsibility.org/wp-content/uploads/2017/06/Core_RecommendedcontentFINAL-1.pdf

Home Office - Modern Slavery Awareness and Victim Identification Guidance: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/655504/6.3920_H

Unseen: <https://www.unseenuk.org/>

Government Updates:

Modern Slavery (Amendment) Bill: <https://www.lexology.com/library/detail.aspx?g=712dc80b-4563-47c4-ba8e-386deaa88649>

GOV.UK - Piloting Devolving Decision Making for Child Victims of Modern Slavery: <https://www.gov.uk/government/publications/piloting-devolving-decision-making-for-child-victims-of-modernslavery>