



Sandwell Anti-Slavery Partnership
Responding to Modern slavery in the care sector

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Background on Modern Slavery and Exploitation Among Skilled Care Workers

Modern slavery and exploitation are growing concerns in the care sector, affecting skilled care workers in Sandwell Council and beyond. Recent years have seen a significant rise in reported cases, highlighting the vulnerabilities faced by care workers who come to the UK to provide vital services. These skilled care workers, often recruited from overseas, endure various forms of exploitation, including financial coercion, excessive fees, long working hours, inadequate pay, and threats of deportation. Such injustices not only violate their rights but also challenge the values of dignity and respect within the care sector. Sandwell Council must take proactive steps to comprehensively address this issue.

The Scope and Significance of this Guidance

This guidance serves as a comprehensive framework for Sandwell Council to effectively respond to the increasing instances of modern slavery and exploitation among skilled care workers in the local care sector. It offers clarity, direction, and actionable steps for council staff, partners, and stakeholders to address this issue.

Introduction to the Sandwell Anti-slavery Partnership

The Sandwell Anti-slavery Partnership unites diverse stakeholders, including local authorities, law enforcement agencies, NGOs, community organisations, and concerned citizens, in a shared mission to combat modern slavery and human trafficking within our community. Together, we work to eliminate this scourge from Sandwell.

Key features of this guide include

Awareness and Identification: Learn how to recognise the red flags of modern slavery and exploitation within care settings. Understand the nuances of this issue, from subtle indicators to overt signs.

Roles and Responsibilities: Explore the roles and responsibilities of key players in the care sector, from Adult Social Care Commissioning Teams to Safeguarding Officers. Discover how each role contributes to the prevention and response to modern slavery.

Prevention Strategies: Gain insights into building a prevention culture within your organisation. Understand the importance of ethical sourcing and supply chain transparency to mitigate the risks associated with modern slavery.

Reporting and Compliance: Learn how to report concerns, follow legal requirements, and collaborate effectively with law enforcement and other stakeholders to combat modern slavery.

Support and Empowerment: Discover resources and strategies to support vulnerable service users and care workers who may be at risk or have been affected by exploitation. Understand the rights of care workers and their entitlement to fair wages and safe working conditions.

Collaboration: Recognise the value of collaborative investigations involving multiple agencies and partners. Understand how working together can enhance the response to modern slavery.

Concerns

Shortage of Qualified Workers on Skilled Worker Visas and Its Impact on Safeguarding in the Care Sector

- **Shortage of Qualified Workers:** The care sector grapples with a shortage of qualified workers eligible for skilled visas, posing significant safeguarding challenges.
- **Strain on Existing Staff:** Limited availability of skilled workers strains current staff, potentially compromising care quality.
- **Hiring Inexperienced Personnel:** To fill gaps, there's a risk of hiring less-experienced or inadequately trained staff, raising the risk of substandard care and jeopardising recipients' safety.

Exploitation and Destitution Risks Among Care Workers on Visa Sponsorship

- **Dependence on Care Worker Visas:** The care sector heavily relies on care workers holding visas.
- **Exploitation of Care Workers:** This dependence has led to widespread exploitation of care workers on these visas.
- **Risk of Destitution:** Possible license revocation poses a risk of destitution for these workers.
- **Exploitative Practices:** These practices, such as low wages and poor conditions, violate workers' rights.
- **Impact on Care Quality:** These practices also harm care quality for patients and residents.



Definition of modern slavery and its various forms:

Modern slavery is a grave violation of human rights and dignity. It encompasses a range of exploitative practices that deprive individuals of their freedom and subject them to inhumane conditions. In the context of the care sector, modern slavery may manifest in several forms, including but not limited to:

Forced Labour: Workers coerced or deceived into providing labour under exploitative conditions, such as long working hours, inadequate pay, and restricted freedom.

Debt Bondage: Workers trapped in a cycle of debt, often through fraudulent recruitment practices, where they are required to work to repay an inflated debt, leaving them vulnerable to exploitation.

Exploitative Recruitment: Unethical recruitment practices, including charging excessive fees, withholding passports or identification documents, and making false promises about working conditions or wages.

Physical and Psychological Abuse: Workers subjected to physical violence, verbal abuse, threats, or intimidation by employers, colleagues, or external perpetrators.

Living Conditions: Care workers living in overcrowded, substandard, or unsuitable accommodation provided by the employer, leading to further exploitation and poor living conditions.

Restricted Movement: Workers having their freedom of movement limited or controlled, either through confiscation of passports or strict surveillance.

Withheld Wages: Employers withholding or significantly deducting wages, making it difficult for workers to escape their exploitative situation or meet basic needs.

Lack of Access to Services: Workers facing barriers in accessing essential services like healthcare, legal aid, or support networks, further isolating them and exacerbating their vulnerability.

Fear and Dependency: Workers exhibiting fearful or submissive behaviour, indicating that they are under the control of others and unable to assert their rights or seek help.

Key indicators and red flags of modern slavery in the care sector:

Recognising the signs of modern slavery is crucial for effective intervention. Local authorities, including Sandwell Council, should be vigilant in identifying potential cases. Key indicators and red flags in the care sector may include:

Excessive Fees: Skilled care workers charged exorbitant fees for recruitment, accommodation, or transportation to the UK.

Low Wages: Care workers receiving wages well below the legal minimum wage, considering the long hours worked.

Confiscation of Documents: Employers or recruiters withholding identification documents, passports, or visas to control workers.

Overcrowded Accommodation: Care workers residing in overcrowded and substandard housing provided by their employers.

Inadequate Rest and Breaks: Workers denied adequate rest breaks, working long hours with little time off.

Language Barriers: Workers with limited English language skills facing difficulties in asserting their rights or seeking assistance.

Isolation: Care workers being isolated from the broader community, including limited social interactions or freedom to leave their place of work or residence.

Fear and Coercion: Workers expressing fear, anxiety, or signs of psychological distress, often due to threats or coercion.

Scams to look out for

To enhance awareness among local authorities regarding potential scams, it is essential to be vigilant throughout the immigration and, where applicable, professional regulation processes during the recruitment journey. A comprehensive understanding of the process, including its timelines, associated costs, and what constitutes fair charges, is crucial.



Fee Scam: This involves the payment of exorbitant fees to secure a health and social care job in the UK.

Contract Scam: Be cautious of contracts that contain excessive and unreasonable repayment clauses, which mandate you to reimburse a significant sum if you leave your job within a specified timeframe.

Job Scam: Watch out for situations where the actual job in the UK differs substantially from what was initially promised. For instance, poor working conditions with extended working hours for minimal compensation.

Visa Scam (Student Visa): Beware of attempts to secure a full-time health or social care job in the UK while holding a student visa, which typically restricts working hours to 20 per week. This may be an effort to bypass the stringent checks required for legal employment in the UK.

Visa Scam (Impersonation): Exercise caution if you are contacted by someone posing as a representative from the UK Visa and Immigration office, insisting on unpaid visa costs. Official organisations do not make unsolicited calls or send emails requesting money or personal banking details.

Fraudulent Document Scam: Some entities may claim to guarantee a 100% pass rate on your language exam, offer to alter your scores, or provide a fake qualification certificate in exchange for a fee. It is strongly advised not to engage in such activities, as you may risk losing your money or facing exposure.

Identity Scam: Refrain from sharing sensitive information like your age, birth date, or bank account numbers with agencies or employers, as this data can be exploited for identity theft.

In the United Kingdom, the legal framework for employment rights is designed to protect both employers and employees, ensuring a fair and just working environment. Whether you are an employer seeking to provide a fair workplace or an employee looking to understand your rights, it's crucial to be familiar with these key legal provisions. Opposite, we outline essential employment rights that apply to both parties:

Employment Rights in the UK:

National Minimum Wage:	Itemised Payslip:	Working Hours:	Annual Leave:	Deductions from Wages:	Sick Pay:	Health and Safety:
<p>Skilled care workers on visas are entitled to receive at least the NMW or NLW, depending on their age and employment type, just like any other employee in the UK.</p>	<p>Employers are required to provide itemised payslips to all employees, including skilled care workers on visas. This payslip should clearly outline both gross pay and net pay, ensuring transparency in their earnings.</p>	<p>The requirement for skilled care workers on visas to work at least 39 hours a week aligns with employment standards in the UK.</p> <p>Employees, including skilled care workers, who work for more than six hours in a day are entitled to a rest break of at least 20 minutes. This applies to skilled care workers on visas.</p>	<p>Skilled care workers on visas are entitled to a minimum number of weeks of paid holiday each year, just like other employees, as specified by law.</p>	<p>Employers can only make specific deductions from employees' wages, and these deductions must be itemised on payslips. Skilled care workers on visas are protected by these regulations.</p>	<p>Employment contracts for skilled care workers on visas should clearly outline the payment they will receive during periods of illness-related absence, including Statutory Sick Pay (SSP) for absences of four or more consecutive days.</p>	<p>Employers are responsible for the health and safety of all employees, including skilled care workers on visas. They must provide necessary training and protective equipment..</p>



Code of practice for International recruitment of health and social care personnel

The [code of practice for the international recruitment of health and social care personnel](#) outlines the UK Government's approach to ensure ethical international recruitment of professionals in the health and social care sector. This code aims to:

- **Establish Ethical Recruitment:** Set standards for ethical recruitment practices.
- **Support Healthcare Systems:** Outline the UK's commitment to supporting both national and international health and social care systems.
- **Safeguard Recruitment:** Implement safeguards for recruiting personnel from countries with pressing healthcare workforce needs.

Principles and Best Practices: The code sets forth principles and best practice benchmarks for all parties involved in international recruitment. These principles promote ethical, managed, and mutually beneficial recruitment practices. Adhering to these principles aligns with guidance from the World Health Organisation (WHO).

Multi-Agency Collaboration: Effective collaboration is encouraged between adult and children's safeguarding teams to facilitate the sharing of information and address interconnected concerns related to modern slavery.

Support Services: To combat modern slavery effectively, it is essential to ensure the availability of adequate support services. These services should be accessible to both adults and children affected by modern slavery, encompassing counselling, legal assistance, and safe accommodation.

Community Engagement: Engaging with communities plays a crucial role in raising awareness of the risks and signs of modern slavery. Encouraging reporting and community involvement are essential components of a comprehensive anti-modern slavery strategy.

Check lists



Building a Prevention Culture

To effectively combat modern slavery in the care sector, it's essential to foster a prevention culture within organisations. This entails:

The Role of Leadership and Governance

- Acknowledging that prevention starts at the top.
- Emphasising the responsibility of leadership in setting the tone.
- Promoting transparency, accountability, and ethical decision-making.
- Ensuring governance structures that prioritise safeguarding and human rights.

Ethical Practices and Organisational Values

- Defining and upholding clear ethical principles.
- Embedding respect for human rights in the organisation's values.
- Aligning practices with a commitment to combating modern slavery.
- Demonstrating a strong stance against exploitation and unethical conduct

Employee and Contractor Awareness and Training

- Recognising that every member of the organisation plays a role.
- Providing comprehensive training on modern slavery awareness.
- Ensuring that employees and contractors understand their responsibilities.
- Encouraging a culture of vigilance and reporting.

Building a Prevention Culture Checklist

Leadership and Governance:

- Leadership Commitment:** Is there visible and vocal support from top leadership for anti-slavery initiatives?
- Policy Development:** Has the organisation developed and communicated clear policies against modern slavery?
- Governance Framework:** Is there a governance structure in place to oversee anti-slavery efforts?
- Reporting Mechanisms:** Are there established channels for staff to report concerns about potential modern slavery?

Ethical Practices and Organisational Values:

- Ethical Sourcing:** Does the organisation practice due diligence to ensure that suppliers uphold ethical labour practices?
- Codes of Conduct:** Are ethical and anti-slavery principles embedded in the organisation's codes of conduct?
- Transparency:** Is the organisation transparent about its efforts to combat modern slavery?

Employee and Contractor Awareness and Training:

- Training Programs:** Are staff members and contractors provided with training on recognising and responding to signs of modern slavery?
- Awareness Campaigns:** Does the organisation regularly raise awareness among employees and contractors about the importance of anti-slavery efforts?
- Reporting Education:** Have employees and contractors been educated about the organisation's reporting procedures for modern slavery concerns?

Sandwell Case example Slavery-Free Sandwell Pledge

Leadership Commitment

As leaders in Sandwell, we commit to making our Borough free of modern slavery.

We actively collaborate with national and local government, law enforcement agencies, businesses, the voluntary and community sector, faith bodies, and local communities to:

- Demonstrate strong local leadership for anti-slavery initiatives.
- Raise awareness among our staff, associates, and the people we serve daily.
- Train our staff to recognise and respond appropriately to potential signs of slavery.
- Share intelligence and information to help detect slavery and prevent its growth.
- Support victims and survivors within our communities.
- Remove slave-based labour from our supply chains.
- Contribute to building a prosperous and slavery-free local economy.

By committing to these actions, Sandwell aligns with the United Nations Global Sustainable Development Goal 8.7 to eradicate forced labour, end modern slavery, human trafficking, and eliminate the worst forms of child labour, abuse, and exploitation by 2030.

Sandwell Commitment

Designated Modern Slavery Program Manager: We have appointed a Modern Slavery Program Manager who oversees the council's efforts in combating modern slavery. This role ensures a coordinated and focused approach to addressing this issue.

Operational Leadership: Our Community Safety Officer leads the operational approach to modern slavery, working closely with relevant stakeholders and agencies to identify, investigate, and respond to cases of modern slavery effectively.

Pledge to Become Slavery-Free: We have pledged to become slavery-free, signifying our firm commitment to eliminating modern slavery in all its forms. This pledge encompasses our determination to eradicate slavery within our operations and supply chains.

Coordinated Response through SHOP: Sandwell Council actively participates in the Slavery and Human Trafficking Operational Partnership (SHOP), which serves as a collaborative platform for coordinating the response to modern slavery throughout the borough.

Awareness and Training: We prioritise raising awareness among staff members and the wider community about the signs of modern slavery and the appropriate actions to take.

Ethical Procurement: Our Corporate Procurement Team undergoes training on modern slavery through the Chartered Institute of Procurement and Supplies (CIPS). This training ensures a thorough understanding of ethical procurement and supply practices to identify and mitigate modern slavery risks within the supply chains.

Partnership with Local Communities: We actively collaborate with local communities, voluntary organisations, and statutory partners to create a united front against modern slavery.

Whistleblowing System: We promote our whistleblowing system, encouraging staff to report any suspected instances of modern slavery. This system is publicised to ensure that potential cases are identified and addressed promptly.

Modern Slavery Maturity Matrix: We commit to using the Local Government Association (LGA) maturity matrix to assess progress in various themes, including leadership, resources, capacity, identifying, referring, and supporting victims, disruption, prevention, and mitigating supply chain risk.



Responding to Modern Slavery Concerns

To effectively address modern slavery in the care sector, we must build a robust prevention culture within our organisations. This involves:

Reporting Procedures and Channels:

- Are there well-defined procedures for staff to report suspicions or concerns related to modern slavery?
- Does the organisation offer confidential channels for reporting, protecting whistle-blowers from potential retaliation?
- Are reporting mechanisms easily accessible to all employees and contractors?

Collaborating with Relevant Authorities:

- Does the organisation collaborate with local law enforcement agencies when modern slavery concerns are raised?
- Is there cooperation with relevant regulatory bodies or government agencies involved in anti-slavery efforts?
- Is there a process for sharing relevant information with authorities while respecting privacy and confidentiality?

Victim Support and Safeguarding Measures:

- Are staff trained to identify potential victims of modern slavery and to handle such cases sensitively?
- Does the organisation have links to support services for victims and survivors of modern slavery?
- Are safeguards in place to protect the safety and well-being of potential victims, including access to counselling and legal support?

Sandwell Case example: Partnership working

Introduction

Modern slavery remains a persistent and complex issue in communities across the United Kingdom. This case study delves into the remarkable efforts of the Slavery and Human Trafficking Operational Partnership (SHOP) and the Sandwell Strategic Anti-Slavery Partnership in Sandwell, showcasing their collaborative actions in responding to and preventing modern slavery.

Setting the Stage

Sandwell, a diverse borough in the West Midlands, is no stranger to the challenges posed by modern slavery. With a commitment to eradicate this grave human rights violation, the region formed SHOP and the Sandwell Strategic Anti-Slavery Partnership.

SHOP and the Sandwell Strategic Anti-Slavery Partnership are shining examples of collaborative, multi-agency efforts to combat modern slavery at the local level. Their proactive approaches, intelligence sharing, and community engagement make them powerful forces in the ongoing fight against this heinous crime, creating safer and more resilient communities in Sandwell.

SHOP: The Slavery and Human Trafficking Operational Partnership

- SHOP is a multi-agency partnership comprised of various organisations, including law enforcement, local authorities, and other stakeholders.
- Its primary focus is to tackle modern slavery, human trafficking, and related exploitation in Sandwell.
- SHOP operates on the principles of collaboration, intelligence sharing, and taking swift action against perpetrators.

Key Achievements:

- ✓ **Effective Intelligence Sharing:** SHOP has fostered an environment of open communication among agencies, allowing for the rapid exchange of intelligence related to modern slavery cases.
- ✓ **Joint Operations:** SHOP has coordinated joint operations with law enforcement agencies, leading to successful arrests and prosecutions of those involved in modern slavery.
- ✓ **Victim Support:** SHOP is dedicated to ensuring the welfare of survivors, working with partners to provide comprehensive support.
- ✓ **Community Engagement:** SHOP actively engages with community groups to raise awareness of modern slavery and empower residents to recognise and report potential cases.

Sandwell Strategic Anti-Slavery Partnership

- The Sandwell Strategic Anti-Slavery Partnership is a dynamic forum where key stakeholders unite to steer the strategic response against modern slavery in the region.
- The partnership includes representatives from Sandwell Council, law enforcement, local organisations, and NGOs.
- Its primary mission is to set the direction for a coordinated and effective response to modern slavery in Sandwell.

Key Achievements:

- ✓ **Spotlight on the Care Sector:** Recognising the vulnerability of the care sector, the partnership initiated a focused effort to address modern slavery within this domain.
- ✓ **Collaborative Chats:** The partnership facilitates collaborative discussions between different teams and agencies to raise awareness of modern slavery's various facets and complexities.
- ✓ **Engaging Domiciliary Care Providers:** Through targeted engagement, the partnership works to raise awareness among domiciliary care providers about modern slavery risks and prevention.
- ✓ **Guidance and Briefings:** The partnership has developed essential guidance and briefing materials to equip local organisations, staff, and community members with the knowledge and tools to recognise and respond to potential modern slavery situations.
- ✓ **Newsletter and Blog:** The partnership utilises its newsletter and blog to shine a spotlight on modern slavery, creating awareness among a wider audience and fostering community involvement.



Building Partnerships

Building Partnerships for Combating Modern Slavery in the Care Sector:

Local Authorities Collaboration:

- Identify relevant local authorities and key contacts responsible for anti-slavery initiatives within the care sector.
- Establish regular communication channels with local authorities specialising in care sector-related modern slavery concerns.
- Actively participate in local anti-slavery networks or taskforces dedicated to the care sector, fostering collaboration and resource-sharing.
- Provide essential data and intelligence to local authorities to support their efforts in identifying and addressing modern slavery within the care sector.

Collaboration with Fellow Care Providers:

- Identify other care providers operating within the same region or sector who can be potential collaborators in the fight against modern slavery.
- Explore opportunities for joint initiatives, training programs, or awareness campaigns with fellow care providers to collectively combat modern slavery in the care sector.
- Share best practices and lessons learned from experiences in tackling modern slavery within the care sector.
- Consider forming or joining industry-specific alliances or associations committed to eradicating modern slavery within the care sector.

Engagement with Advocacy Groups and NGOs Specialising in the Care Sector:

- Research and identify relevant advocacy groups and NGOs actively involved in anti-slavery efforts within the care sector.
- Cultivate relationships with these organisations and explore opportunities for tailored collaboration specific to the care sector.
- Support advocacy groups and NGOs in their awareness campaigns, victim support programs, or policy advocacy efforts within the care sector.
- Actively participate in events, seminars, or conferences organised by advocacy groups or NGOs focused on addressing modern slavery within the care sector to stay updated on the latest developments and strategies.



Preventing Modern Slavery in the Supply Chain

Preventing modern slavery in the care sector goes beyond organisational boundaries. It extends to the supply chain, where vigilance and ethical sourcing are paramount:

Due Diligence and Ethical Sourcing in the Care Sector:

- Implement a rigorous due diligence process for evaluating potential suppliers within the care sector. Assess their commitment to ethical practices and their track record in preventing modern slavery in caregiving services.
- Give preference to suppliers in the care sector who align with your organisation's anti-slavery values and principles, particularly in eradicating modern slavery from caregiving operations.
- Source caregiving products and services in a way that minimises the risk of modern slavery. Consider geographic locations, supplier practices, and industry-specific risks in the care sector.

Monitoring and Auditing Caregiving Suppliers:

- Establish a system for ongoing monitoring of caregiving supplier activities. This includes periodic audits and assessments to ensure compliance with ethical labour standards specific to the care sector.
- Hold caregiving suppliers accountable for upholding ethical labour standards and eradicating modern slavery within the care sector. Clearly communicate your expectations and consequences for non-compliance.
- If issues related to modern slavery or ethical violations are identified within caregiving suppliers, take prompt action. Collaborate with them to address problems, rectify situations, and prevent future occurrences within the care sector.

Encouraging Responsible Labour Practices in Caregiving:

- Promote responsible labour practices throughout the care sector supply chain. This includes advocating for fair wages, safe working conditions, and the elimination of exploitative labour practices in caregiving.
- Actively engage with caregiving suppliers to ensure they are committed to eradicating modern slavery within the care sector. Encourage them to adopt policies and practices that align with your anti-slavery objectives in caregiving services.



Reporting and Compliance

Incorporating these elements into reporting and compliance efforts ensures organisations fulfil legal obligations while contributing to the broader goal of eradicating modern slavery from their operations and supply chains.

Legal Reporting Requirements in the Care Sector:

- Understand the legal reporting requirements related to modern slavery specific to the care sector, such as the Modern Slavery Act or sector-specific regulations.
- Establish a process for ensuring compliance with the reporting obligations within caregiving, including timelines and responsible individuals.
- Be aware of the consequences of non-compliance within the care sector, including potential legal penalties and reputational risks.

Transparency and Disclosure Obligations in the Care Sector:

- Recognise the importance of transparency in demonstrating a commitment to combating modern slavery within the care sector.
- Develop a clear and comprehensive Modern Slavery Statement specific to caregiving operations, including information on prevention efforts, challenges, and progress.
- Ensure your statement discloses any identified cases of modern slavery within caregiving and the actions taken to address them.

Tracking and Measuring Progress in the Care Sector:

- Establish key performance indicators (KPIs) within the care sector to measure the effectiveness of your anti-slavery efforts in caregiving.
- Regularly track and analyse data related to modern slavery in caregiving, such as reported incidents, training completion rates, and supplier assessments.
- Use the insights gained from tracking to identify areas for improvement within the care sector and inform decision-making specific to caregiving services.



Modern slavery in the care sector Dashboard

This Power BI dashboard serves as a dynamic and essential tool for monitoring and tracking modern slavery referrals within the Care Sector. It provides a comprehensive overview of referrals made to the SHOP (Slavery and Human Trafficking Operational Partnership), offering insights, trends, and data crucial for combatting modern slavery in caregiving operations. With real-time information at your fingertips, this dashboard empowers informed decision-making and proactive measures in the ongoing fight against modern slavery within the Care Sector.



Team roles and responsibilities

Team roles and responsibilities

In our collective efforts to combat modern slavery within the care sector, we recognise the vital roles played by various teams within the Local Authority. These teams bring unique perspectives, skills, and responsibilities to the forefront of our anti-slavery initiatives. Here's an overview of the main areas of focus for each team:

Adult Social Care Commissioning Team

- ✓ **Strategic Planning:** Developing and implementing strategies to ensure high-quality care services.
- ✓ **Contract Management:** Overseeing care service providers' compliance with contractual obligations.
- ✓ **Quality Assurance:** Monitoring and evaluating care services to safeguard quality and safety.
- ✓ **Modern Slavery Consideration:** Integrating anti-slavery measures into commissioning processes.

Adult Safeguarding Teams

- ✓ **Protection and Advocacy:** Identifying and addressing risks of modern slavery to vulnerable adults.
- ✓ **Incident Reporting:** Managing reports of potential slavery cases and conducting investigations.
- ✓ **Support and Intervention:** Offering assistance and safeguarding measures for potential victims.
- ✓ **Education and Awareness:** Raising awareness among staff and the community about modern slavery.

Procurement of Adult Social Care

- ✓ **Supplier Assessment:** Evaluating potential care providers for ethical practices.
- ✓ **Contractual Agreements:** Ensuring that modern slavery clauses are integrated into contracts.
- ✓ **Monitoring and Compliance:** Overseeing suppliers' adherence to anti-slavery requirements.
- ✓ **Ethical Sourcing:** Promoting responsible sourcing of care services within the supply chain.

Modern Slavery Team

- ✓ **Coordination:** Overseeing and coordinating anti-slavery efforts within the Local Authority.
- ✓ **Training and Guidance:** Providing training and guidance to teams across the authority.
- ✓ **Reporting and Compliance:** Managing modern slavery reporting obligations and compliance.
- ✓ **Community Engagement:** Building partnerships with community groups to combat slavery.

Reporting Concerns

In our collective efforts to combat modern slavery within the care sector, we recognise the vital roles played by various teams within the Local Authority. These teams bring unique perspectives, skills, and responsibilities to the forefront of our anti-slavery initiatives. Here's an overview of the main areas of focus for each team:

Reporting Concerns Through SHOP

- **Gangmasters Labour Abuse Authority (GLAA):** Concerns should be reported through the local SHOP contact. The SHOP contact will facilitate communication with the GLAA.
- **Police:** Suspicious activities or potential modern slavery cases should be reported to the police using the established Fib Form process.
- **HMRC (Her Majesty's Revenue and Customs):** HMRC plays a role in addressing potential financial aspects of modern slavery cases, such as illegal wages and exploitation.
- **Immigration Authorities:** Reporting concerns to immigration authorities is crucial in cases involving potential immigration violations or exploitation related to immigration status.
- **Local Authority:** The local authority, as part of SHOP, plays a key role in coordinating responses, sharing information, and providing support to potential victims.

Extended Agency Engagement

- **Adult Social Care (ASC) and Children's Social Care (CSC) Commissioning Teams:** Concerns should be shared with the ASC/CSC commissioning teams responsible for overseeing the services provided by domiciliary agencies.
- **UK Sponsorship Team:** Any concerns related to breaches of sponsorship license conditions should be reported to the UK Sponsorship Team at SponsorComplianceTeam@homeoffice.gov.uk
- **Employment Agency Standards Inspectorate (EAS):** If there are reports of recruitment organisations, agencies, or collaborations charging fees for work-finding services, these concerns should be reported to the Employment Agency Standards Inspectorate. This is illegal under the Employment Agencies Act 1973. Reports can be made via email at eas@beis.gov.uk or by completing the online form for complaints about pay and work rights.
- **Care Quality Commission (CQC):** If concerns are raised about the quality of care provided by a domiciliary agency, they should be reported to the Care Quality Commission. Reports can be made through the CQC's online feedback form or by emailing enquiries@cqc.org.uk

Key Agencies and Actions: Addressing Concerns in Domiciliary Agencies

GLAA (Gangmasters Labour Abuse Authority)

- Investigate labour exploitation and violations.
- Collaborate with SHOP.
- Enforce labour laws.

Police

- Investigate modern slavery reports.
- Collect evidence.
- Issue cease and desist orders where appropriate.
- Collaborate with SHOP.

HMRC (Her Majesty's Revenue and Customs)

- Review financial records.
- Investigate pay practices.
- Cooperate with law enforcement.

Immigration Authorities

- Investigate immigration violations.
- Assess immigration status.
- Provide support.

Local Authority

- Coordinate responses.
- Provide support services.
- Issue cease and desist orders where appropriate.

Adult/Childrens social care

- Review contracts for compliance.
- Terminate contracts if necessary.
- Support potential victims.
- Conduct Human Rights assessments.

UK Sponsorship Team

- Address sponsorship violations.
- Take legal actions, including license revocations.

EAS (Employment Agency Standards Inspectorate)

- Investigate illegal fees.
- Take enforcement actions.

CQC (Care Quality Commission)

- Assess care quality.
- Take regulatory actions.

Jobs Aware

- Support affected workers.
- Investigate job scams.
- Take necessary actions.

Guidance notes

What to Look For as a Monitoring Officer

As a monitoring officer responsible for overseeing care settings, your role plays a crucial part in ensuring the safety and well-being of individuals under your jurisdiction. While you may not have access to all aspects of the facility, there are several indicators and red flags you can watch out for during your visits to help identify potential signs of modern slavery.

Remember that your role as a monitoring officer is critical in safeguarding the well-being of vulnerable individuals in care settings. By vigilantly observing, documenting, and addressing potential signs of modern slavery, you contribute to creating safer and more ethical care environments.



Multiple Workers at a Single Address: Pay attention to care agencies where multiple workers are residing at the same address. This could indicate overcrowding and potentially substandard living conditions. Document such instances and raise concerns with relevant authorities, such as the modern slavery team or immigration officials.

Signs of Unethical Recruitment: Be on the lookout for signs of unethical recruitment practices, such as excessive recruitment fees, wage deductions, or unexpected charges. Document such instances and raise concerns with relevant authorities, such as the modern slavery team or immigration officials.

Reviewing Companies House Accounts: Cross-reference the size of the workforce and the size of contracts with the company's financial records on Companies House. If there are discrepancies or indications of financial irregularities, consider further investigation in collaboration with relevant authorities.

Checking CQC Reports: Examine Care Quality Commission (CQC) reports from other areas for care providers operating under your jurisdiction. Look for patterns in these reports, such as declining standards or frequent safeguarding concerns. Address these issues promptly with the care provider.

Patterns in Care Quality: Pay attention to any patterns in care quality, especially if you notice a consistent decline in standards or a lack of improvement. Engage with the care provider to discuss these concerns and establish a plan for corrective actions.

Monitoring Worker Conditions: Observe the behaviour and well-being of care workers during your visits. If you notice signs of exploitation, fear, or distress among workers, engage with them discreetly to offer support and guidance.

Encouraging Reporting: Evaluate whether care staff and residents are aware of the procedures for reporting concerns about abuse, exploitation, or substandard conditions. Encourage open communication and ensure that reporting mechanisms are easily accessible and free from fear of retaliation.

Documentation Review: Review essential documentation, including care plans, incident reports, and financial records. Look for irregularities, inconsistencies, or unexplained entries that may indicate issues requiring further investigation.

Sponsoring Overseas Workers:

Sponsoring overseas workers under your company name is a significant responsibility and commitment. It involves a contractual agreement between the issuer of the license (the Home Office) and the license holder (the care sector organisation) that the terms and conditions of the license will be diligently met. This commitment is fundamental to ensuring that care workers from overseas can work legally and ethically within the UK.

1. Obtain a Sponsorship License:

To employ workers from outside the UK and the European Economic Area (EEA), a care sector organisation must first apply for and obtain a Sponsorship License from the Home Office. This license authorises the organisation to sponsor overseas workers.

2. Sufficient Available Work:

The organisation **must have** a minimum of 39 hours of work available per week for each sponsored worker. This availability can extend beyond 39 hours as needed to meet operational demands.

3. Salary Requirements:

Guarantee that all sponsored workers **are paid a minimum** of £20,900 per annum, meeting the financial threshold set by the UK government. It's crucial to ensure that salaries are competitive and fair.

4. Training and Monitoring:

Provide comprehensive training to sponsored workers, ensuring that it aligns with government requirements for the care sector. Establish monitoring mechanisms to track training progress and ongoing development.

5. Qualifications and Skills:

Ensure that the sponsored person possesses the relevant qualifications and skills that meet the UK government's standards and criteria for the care sector. This includes verifying qualifications and assessing skills through a robust recruitment process.

6. Consider Well-being:

Prioritise the well-being of sponsored workers. Ensure that they have access to suitable living conditions, including accommodations that adhere to safety and health standards. Offer support and assistance for any concerns related to their physical or mental well-being.

7. Record Keeping and Reporting:

Maintain accurate and up-to-date records of sponsored workers, including visa details, working hours, salary payments, and training records. Be prepared to report any significant changes, such as a sponsored worker leaving their role or changes in their circumstances, to the Home Office.

8. Renewal and Compliance:

Be proactive in managing visa renewals for sponsored workers. Ensure that they apply for visa extensions in a timely manner to avoid any lapse in their right to work in the UK.

9. Stay Informed:

Keep abreast of immigration laws and regulations. Be aware of any changes to government policies, visa requirements, and financial thresholds that may impact the sponsorship of overseas workers.

10. Seek Legal Counsel:

- Consider seeking legal advice or consulting with immigration experts to navigate the complexities of the sponsorship process, ensuring full compliance with UK immigration laws.



Understanding Sponsor Compliance:

In the United Kingdom, if a company intends to employ individuals who are not settled workers or those without immigration permission to work in the UK, they must obtain authorisation from the Home Office. This authorisation comes in the form of a 'sponsor license,' and organisations that hold such licenses are known as 'sponsors.'

The [register of licensed sponsors](#) for workers is available online and updated regularly.

Every sponsor is obligated to adhere to the duties outlined in the 'Guidance for Sponsors,' which is regularly updated and can be found at: [Sponsorship: guidance for employers and educators - GOV.UK](#)



License Suspension:

- The sponsor receives a suspension notification letter via email, detailing the reasons for suspension.
- The sponsor has 20 working days from the date of the written notification to respond in writing, including relevant supporting evidence if they believe the grounds for suspension are incorrect.

If a response is received, the sponsor is informed of the final decision in writing within 20 working days. In the absence of a response, the Home Office proceeds with appropriate action and informs the sponsor of the decision in writing.

Impact of Sponsor License Suspension on a Company:

The company is removed from the public version of the register of sponsors during the suspension period.

The sponsor cannot sponsor any more individuals to come to UK.

Impact of Sponsor License Suspension on Workers:

Workers sponsored at the time of suspension are not affected unless the Home Office decides to revoke the license.

Prospective sponsored workers with pending visa applications have their applications placed on hold until the suspension reasons are resolved.

Revocation of license

- The sponsor receives a revocation notification letter via email, explaining the reasons.
- Upon revocation, the company can no longer sponsor workers and is permanently removed from the public register of Worker and Temporary Worker sponsors.
- There is no right of appeal against a revocation decision, but a judicial review can be sought.
- The company can reapply for a sponsor license after 12 months, known as a 'cooling-off' period.

Notification to Sponsored Workers:

The Sponsor Compliance Team notifies each sponsored worker of the revocation shortly after the decision.

Existing permissions (visas) remain valid unless another Home Office department informs them otherwise.

Visa Shortening or Cancellation Following Revocation:

Sponsored workers' remaining permission to enter or stay in the UK is normally shortened to 60 calendar days.

The worker must find a new sponsor or regularise their stay in the UK through another immigration route before their permission expires.

Sponsor compliance is a critical aspect of the sponsorship process, and organisations must maintain strict adherence to Home Office guidance to ensure the integrity of their sponsor license and the well-being of sponsored workers.

Worker Empowerment and Rights

In the care sector, it's crucial to empower care workers with knowledge about their rights and provide resources to support them. This page is dedicated to educating care workers about their rights and promoting a fair and safe working environment.

Empowering care workers with knowledge about their rights not only benefits them but also contributes to a more just and ethical care sector. When care workers are aware of their rights and supported in asserting them, they can confidently contribute to providing high-quality care while enjoying fair and safe working conditions.

1. Right to Fair Wage:

Care workers have the right to receive a fair wage for their work, in accordance with employment contracts and legal requirements.

2. Right to Safe Working Conditions:

Care workers should work in environments that prioritise safety. Employers must ensure that appropriate safety measures are in place to protect workers from harm.

3. Right to Freedom from Exploitation:

Care workers have the right to be free from exploitation, coercion, and forced labour. They should not be subjected to unethical recruitment practices, excessive fees, or wage deductions.

4. Knowledge Is Empowerment:

Provide care workers with comprehensive information about their rights. This can be done through training sessions, informational materials, or online resources.

5. Legal Assistance Resources:

Offer access to legal assistance resources and organisations that specialise in labour rights and worker protection. Care workers should know where to turn if they believe their rights are being violated.

6. Reporting Mechanisms:

Ensure that care workers are aware of internal and external reporting mechanisms for raising concerns about unfair treatment, exploitation, or unsafe working conditions.

7. Encourage Open Communication:

Create an environment where care workers feel comfortable reporting concerns and speaking up about potential rights violations. Encourage open dialogue.

8. Provide Support Networks:

Foster a sense of community among care workers, where they can support one another and share experiences. Peer support can be invaluable in addressing workplace challenges.

9. Raise Awareness of Modern Slavery:

Educate care workers about the signs of modern slavery and human trafficking. Encourage them to be vigilant and report any suspicious activities.

10. Offer Ethical Recruitment Information:

Ensure care workers understand what constitutes ethical recruitment and what to look for in employment contracts to avoid potential exploitation.

11. Promote Training Opportunities:

Encourage care workers to take advantage of training opportunities that can enhance their skills and knowledge in the field, empowering them to excel in their roles.

12. Stay Informed:

Stay updated on changes in labour laws and regulations to ensure care workers' rights are consistently protected.

Ensuring Safe Living Conditions

When assessing the accommodation provided to care workers by domiciliary care agencies, it's essential to ensure that living conditions meet certain standards for the well-being and safety of these workers.

Assessing accommodation standards is crucial to safeguarding the well-being and dignity of care workers. It helps identify and address potential risks, ensuring that care workers live in safe, hygienic, and respectful conditions.

1. Overcrowding:

Observation: Look for signs of overcrowding in shared living spaces, such as bedrooms or common areas. Multiple workers sharing a single room may indicate overcrowding.

Action: Document instances of overcrowding and report concerns to the appropriate authorities, such as the modern slavery team or relevant housing and safety agencies.

2. Safety Concerns:

Observation: Inspect the accommodation for safety hazards, including faulty wiring, inadequate heating or ventilation, or fire safety risks.

Action: Report any safety concerns immediately to the modern slavery team and relevant housing and safety authorities to address potential risks.

3. Hygiene and Sanitation:

Observation: Check the cleanliness and hygiene of shared areas, kitchens, bathrooms, and sleeping quarters. Poor hygiene can lead to health risks.

Action: Document unsanitary conditions and notify the appropriate authorities, such as local public health agencies, for intervention.

4. Adequate Facilities:

Observation: Ensure that the accommodation provides essential facilities, such as cooking and laundry facilities, as well as comfortable and private sleeping areas.

Action: Document any lack of essential facilities and report it to the modern slavery team for investigation.

5. Compliance with Regulations:

Observation: Verify that the accommodation complies with local housing regulations and standards set by relevant authorities.

Action: If the accommodation does not meet regulatory standards, report the issue to local housing authorities and the modern slavery team for further action.

6. Worker Testimonies:

Observation: Pay attention to statements and experiences of care workers residing in the accommodation. They may reveal concerns about living conditions, treatment, or exploitation.

Action: Encourage workers to share their experiences and concerns confidentially. Document their testimonies and report any instances of exploitation or substandard living conditions to the modern slavery team.

7. Language and Communication:

Observation: Assess communication between care workers and accommodation providers. Language barriers may hinder effective communication about accommodation issues.

Action: Address language barriers and ensure that workers can communicate their concerns. Provide translation or interpretation services if necessary.

8. Privacy and Dignity:

Observation: Ensure that care workers have private and dignified living conditions, respecting their right to privacy and personal space.

Action: Document any breaches of privacy and report them to the modern slavery team or relevant authorities.

Recognising Modern Slavery:

As a social worker or safeguarding officer, your role is pivotal in ensuring the safety and well-being of vulnerable individuals. In the context of the care sector and modern slavery, your keen awareness and vigilance can make a significant difference.

Your role as a social worker or safeguarding officer is vital in safeguarding vulnerable individuals. By recognising these potential indicators of modern slavery and exploitation, you can take the necessary steps to protect those under your care and ensure their rights and well-being are upheld.

Remember, your observations and actions can contribute significantly to the prevention and detection of modern slavery in the care sector. Your dedication to safeguarding is a beacon of hope for those who may be at risk.

1. Multiple Workers at a Single Address:

Observation: Pay attention to care agencies where multiple workers are residing at the same address. This could indicate overcrowding and potentially substandard living conditions.

Action: Document such instances and raise concerns with relevant authorities, such as the modern slavery team or immigration officials.

2. Signs of Unethical Recruitment:

Observation: Be on the lookout for signs of unethical recruitment practices, such as excessive recruitment fees, wage deductions, or unexpected charges.

Action: Document such instances and raise concerns with relevant authorities, such as the modern slavery team or immigration officials.

3. Reviewing Companies House Accounts:

Observation: Cross-reference the size of the workforce and the size of contracts with the company's financial records on Companies House.

Action: If there are discrepancies or indications of financial irregularities, consider further investigation in collaboration with relevant authorities.

4. Checking CQC Reports:

Observation: Examine Care Quality Commission (CQC) reports from other areas for care providers operating under your jurisdiction.

Action: Look for patterns in these reports, such as declining standards or frequent safeguarding concerns. Address these issues promptly with the care provider.

5. Worker Testimonies:

Observation: Pay close attention to the statements and experiences of care workers.

Action: Document worker testimonies, ensuring anonymity if requested. Report concerns to relevant authorities, such as the modern slavery team or labour rights organisations.

6. Safeguarding Alerts:

Observation: Any reports or alerts from service users, their families, or other professionals regarding potential exploitation or abuse.

Action: Investigate safeguarding alerts promptly, following established protocols. Collaborate with relevant agencies, such as the modern slavery team, police, or healthcare professionals, to ensure the safety of the individuals involved.

7. High Worker-to-Client Ratios:

Observation: Unusually high caseloads for care workers, which may indicate staff shortages or overworking.

Action: Report instances of high worker-to-client ratios to the appropriate channels within your organisation, such as management or the modern slavery team.

8. Language and Communication Issues:

Observation: Difficulty communicating with care workers due to language barriers, suggesting a lack of proper assessment of language skills during recruitment.

Action: Raise concerns about language and communication issues with your organisation's recruitment and training teams.

Supporting Vulnerable Service Users

In the provision of care services, it's essential to be vigilant and responsive to the needs of vulnerable service users who may be at risk of exploitation or neglect.

By taking a compassionate and proactive approach, care providers can play a vital role in safeguarding vulnerable service users from exploitation or neglect. This commitment to the well-being and safety of individuals under their care is essential in creating a safer and more supportive environment.

1. Build Trusting Relationships:

Establish open and trusting relationships with service users. Communication built on trust allows individuals to feel safe disclosing concerns or seeking help.

3. Identify Signs of Exploitation:

Be familiar with common signs of exploitation, such as financial abuse, coercion, isolation, or control by others. These signs may not always be obvious.

4. Encourage Open Communication:

Create an environment where service users feel comfortable discussing their concerns. Encourage them to share any worries or suspicions they may have.

5. Listen Actively:

Practice active listening, which involves giving your full attention, asking clarifying questions, and acknowledging the person's feelings and experiences.

6. Respect Privacy:

Respect the privacy and confidentiality of service users. Assure them that any information they share will be kept confidential unless it poses a risk to their safety.

7. Report Concerns Promptly:

If you suspect abuse or exploitation, follow established reporting procedures promptly to ensure that service users receive appropriate protection and assistance.

8. Provide Information and Education:

Educate service users about their rights, the types of abuse or exploitation that can occur, and how to recognise and report concerning situations.

9. Collaborate with Safeguarding Teams:

Establish protocols for collaborating with local safeguarding teams or authorities to report and address potential cases of exploitation or neglect.

10. Document Concerns:

Maintain accurate records of any concerns, incidents, or disclosures made by service users. Document the date, time, and nature of the concern.

11. Offer Support Services:

Provide information about available support services, including helplines, advocacy, counselling, and legal assistance, to empower service users to seek help.

12. Conduct Risk Assessments:

Regularly assess the risk factors associated with service users' circumstances, including their living arrangements and relationships.

14. Tailor Support Plans:

Develop individualised care and support plans that address the specific needs and vulnerabilities of service users.

Safety Planning for Care Workers

Care workers play a vital role in the lives of those they support. However, there may be instances where they find themselves in situations that feel exploitative or abusive. It's essential for care workers to be aware of safety planning measures to protect themselves and seek help if needed.

Remember, your safety and well-being are paramount. If you suspect modern slavery, exploitation, or abuse in your workplace, don't hesitate to seek help. By taking proactive steps and seeking support, you can protect yourself and contribute to a safer and more ethical work environment in the care sector.

1. Trust Your Instincts:

If something doesn't feel right, trust your instincts. If you suspect exploitation or abuse, take it seriously.

2. Document Everything:

Maintain a record of work-related incidents, unusual demands, or any actions that concern you. This documentation can be invaluable if you need to report problems.

3. Know Your Rights:

Understand your employment rights, including wage entitlements, working hours, and employment contracts. Seek advice from employment or union representatives if needed.

4. Seek Legal Advice:

If you believe your rights are being violated, consult with an attorney who specialises in labour or employment law. They can provide guidance on your legal options.

5. Safety in Numbers:

Avoid isolated situations. Whenever possible, work with colleagues, especially in unfamiliar or potentially risky environments.

6. Report Concerns:

Report any concerns about exploitation, abuse, or unethical practices to your supervisor, manager, or human resources department. Ensure that there's a clear reporting mechanism in place.

7. Seek Support:

Don't hesitate to seek support from friends, family, or colleagues if you're facing difficulties at work. Sharing your concerns can help alleviate stress.

8. Contact Employee Unions:

If you're part of a union, reach out to your union representative. They can provide advice, advocate on your behalf, and ensure your rights are protected.

9. Explore External Support Services:

- Familiarise yourself with external organisations that offer support to workers. In the UK, organisations like ACAS, Citizens Advice, and local trade unions can provide guidance.

10. Reporting to Relevant Authorities:

- If you believe you've encountered modern slavery or human trafficking, report your concerns to local law enforcement or the Modern Slavery Helpline (UK: 08000 121 700).

11. Maintain Your Well-being:

- Focus on self-care to help manage stress. Maintain a healthy work-life balance, engage in activities that relax you, and seek professional help if needed.

12. Stay Informed:

- Keep up-to-date with resources and support services available in your area. Being informed empowers you to access help when necessary.

Collaborative Investigations

Collaborative investigations involving multiple agencies are a powerful tool in the fight against modern slavery. When agencies such as the police, modern slavery teams, and immigration authorities work together, they can more effectively uncover, prevent, and address cases of exploitation and human trafficking.

Collaborative investigations harness the collective expertise, resources, and authority of multiple agencies, increasing the likelihood of successful outcomes. By working together, these agencies can better protect victims, prosecute perpetrators, and prevent further instances of modern slavery.

1. Establish Clear Objectives:

Define the specific goals of the investigation. Determine what you aim to achieve, such as identifying perpetrators, rescuing victims, or dismantling criminal networks.

2. Formulate a Multidisciplinary Team:

Assemble a team with representatives from relevant agencies, including law enforcement, modern slavery teams, immigration authorities, and other stakeholders. Ensure each member has a defined role and responsibilities.

3. Share Information:

Information sharing is critical. Establish protocols and mechanisms for sharing information securely and efficiently among team members. This may include data sharing agreements and secure communication channels.

4. Coordinate Actions:

Develop a coordinated action plan that outlines the sequence of activities and responsibilities for each agency. Ensure that everyone understands their role and how it contributes to the investigation.

5. Conduct Joint Interviews:

When interviewing victims, witnesses, or suspects, consider conducting joint interviews with specialists from different agencies present. This approach can minimise the need for victims to repeat their stories multiple times.

6. Pool Resources:

Collaboration often allows agencies to pool resources, increasing the efficiency of the investigation. This can include sharing forensic resources, surveillance teams, or specialised equipment.

7. Legal Framework and Evidence Handling:

Ensure that all actions taken during the investigation comply with legal requirements. Establish protocols for evidence handling, preservation, and documentation to ensure that evidence is admissible in court.

8. Victim-Centered Approach:

Prioritise the well-being and safety of victims. Provide support services, including access to legal representation, medical care, and shelter. Consider the potential risks to victims during the investigation.

9. Regular Updates and Debriefs:

Hold regular team meetings to share progress, discuss findings, and adapt the investigative strategy as needed. Debriefs can help identify challenges and areas for improvement.

10. Cultural Competence:

Recognise the importance of cultural sensitivity and understanding, especially when dealing with victims from diverse backgrounds. Cultural competence can build trust and facilitate effective communication.

11. Report and Disseminate Findings:

Compile and analyse the findings of the collaborative investigation. Prepare reports that can inform policy changes, support prosecutions, or raise awareness about modern slavery issues.

Any concern in relation to modern slavery
in Sandwell should be referred to the
Sandwell Slavery and Human Trafficking
operational Partnership (SHOP)

Modern_slavery@sandwell.gov.uk

