



Modern Slavery and Human Trafficking Policy Statement

1.0 Policy Statement

- 1.1 Drive is committed to preventing modern slavery and human trafficking in all aspects of our business and supply chains. We recognise our duty under the Modern Slavery Act 2015 and affirm our zero-tolerance approach to slavery, servitude, forced labour, and human trafficking.
- 1.2 As a registered social care provider regulated by Care Inspectorate Wales (CIW), and operating within Wales, our responsibilities extend to the individuals we support, our staff, and the wider community.
- 1.3 We believe that all individuals have the right to live free from exploitation, coercion, and abuse. We are committed to upholding the values of dignity, respect, and safeguarding throughout all our operations.

2.0 Scope

2.1 This policy applies to:

- All employees, agency workers, volunteers, and trustees.
- Contractors and suppliers providing goods or services to the organisation.
- Any other individual or organisation acting on behalf of Drive

3.0 Our Commitment

3.1 We are committed to:

- Identifying and mitigating the risks of modern slavery within our organisation and supply chains.
- Raising awareness of modern slavery among staff, volunteers, and service users.
- Ensuring safeguarding policies and procedures are robust and consistently followed.
- Working collaboratively with statutory agencies, including CIW, local authorities, and the police.
- Providing safe, inclusive environments where individuals are empowered to report concerns.

4.0 Due Diligence and Risk Management

4.1 To address modern slavery risks, we:

- Conduct thorough recruitment checks including right-to-work verification and references.
- Ensure our suppliers and contractors meet ethical labour standards and comply with the Modern Slavery Act 2015.
- Use procurement frameworks that include modern slavery clauses.
- Regularly review risk in relation to geographic location, sector, and nature of work.

5.0 Training and Awareness

5.1 All staff and volunteers receive safeguarding training which includes:

- Recognising signs of modern slavery and human trafficking.
- Reporting mechanisms and whistleblowing procedures.
- Understanding their responsibilities under this policy.
- Additional targeted training is provided to managers, HR staff, and those involved in procurement.

6.0 Reporting and Whistleblowing

6.1 Drive encourages all staff, volunteers, and service users to report concerns without fear of retaliation.

6.2 Reports can be made via:

- Our Designated Safeguarding Lead.
- Our confidential whistleblowing line or email.
- Directly to external bodies such as the Modern Slavery Helpline (0800 0121 700).

6.3 All reports will be treated seriously and investigated in line with our safeguarding and disciplinary procedure.

7.0 Safeguarding Integration

7.1 This policy works in conjunction with our:

- Safeguarding Policy
- Recruitment and Selection Policy
- Code of Conduct
- Whistleblowing Policy

7.2 We also follow the Social Services and Well-being (Wales) Act 2014, ensuring

that safeguarding principles underpin all aspects of care and support.

8.0 Monitoring and Review

- 8.1 This policy is reviewed annually by the Board of Trustees and the senior leadership team, or sooner if there are changes in legislation or regulatory guidance.

STATUS BOX FOR POLICIES

Name of Policy	Modern Slavery and Human Trafficking Policy
Date reviewed	April 2025

THIS POLICY APPLIES TO:

All employees.

It is the responsibility of employees to comply with this Policy. Failure to do so may result in disciplinary action.

THIS POLICY CROSS REFERENCES TO:

- Safeguarding Policy
- Recruitment and Selection Policy
- Code of Conduct
- Whistleblowing Policy

Where an employee has questions about and/or needs clarification of any aspect of this policy, the employee should check with their line manager. Where appropriate, training will be provided in the policy and procedure to ensure knowledge, compliance, and best practice across Drive.

This policy will be reviewed on a 2 year cycle to ensure Drive's policy and practices remain effective, are up to date with legislative and regulatory changes, reflect good practice and capable of supporting Drive's objectives