Day Lewis Group
Modern Slavery Prevention Policy

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Modern Slavery Prevention Policy

Policy Statement

The Executive Management of the Day Lewis group of companies is committed to conducting its business in compliance with the law and the highest ethical standards, ensuring that modern slavery is not in any way present in any part of our business or supply chain.

The company is committed to increasing awareness of the practice of modern slavery and will endeavour to ensure that all colleagues are able to identify and take the appropriate steps necessary, to safeguard people vulnerable to exploitation.

This policy supports the legal and ethical framework for healthcare professionals working within the business.

Our senior leaders and board members are committed to an open and transparent culture that provides colleagues with the support and tools they need to safeguard and protect members of the public, our colleagues, and patients from exploitation.

This policy is created in the context of the Day Lewis core values of a Caring Family Culture and Looking After Our Customers. It fully takes into consideration the legislative requirements of the Modern Slavery Act 2015 and the Human Rights Act 1998.

This Policy and associated procedures are overseen by the Day Lewis Risk Management Committee (RMOC) and reviewed on a regular basis.

1. Objectives, Aim and Scope

1.1. Aims and Objectives

The objectives of Day Lewis Modern Slavery Prevention Policy are to:

Ensure that colleagues can identify signs and behaviours associated with modern slavery to identify potential victims of this practice.

To ensure that colleagues know how to raise concerns about the welfare of a patient, colleague, or other individual who they suspect is a victim of modern slavery.

1.2. Scope

This policy applies to all Day Lewis Group Companies and all colleagues employed by them. It should be used to help identify and safeguard people who may have been subject to modern slavery practice.

The policy should be used in line with relevant HR, IT policies and buying/wholesale policies to ensure compliance with the Modern Slavery Act 2015 and high standards of recruitment and wholesaling.

2. Legislation

2.1. The Day Lewis Group is obliged to abide by all relevant UK legislation. Day Lewis shall comply with the following legislation and other legislation as appropriate in the creation and application of this policy:

- Modern Slavery Act 2015
- Human Rights Act 1998

3. Policy

3.1 Definition

Modern slavery is the recruitment, movement, harbouring or receiving of children, women, or men using force, coercion, the taking advantage of vulnerability, deception, or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for several reasons including sexual exploitation, forced labour, domestic servitude, and organ harvesting.

Victims of modern slavery may only come to attention when seriously ill, injured or with an injury or illness that has been left untreated.

Possible health related signs that a person may be the victim of modern slavery may include:

- Evidence of long-term multiple injuries
- Indications of mental, physical, and sexual trauma
- Sexually transmitted infections (STIs)
- Pregnancy (or a late booking over 24 weeks for maternity care)
- Disordered eating or poor nutrition
- Evidence of self-harm
- Dental pain
- Fatigue
- Non-specific symptoms of post-traumatic stress disorder (PTSD)
- Symptoms of psychiatric and psychological distress
- Back pain, stomach pain, skin problems
- Headaches and dizzy spells

- Depression
- Chemical burns and pesticide poisoning
- Memory problems
- Hypothermia or dehydration

People who have been trafficked sometimes find it difficult to admit and express what has happened to them, are fearful of the consequences of doing so, or simply don't recognise that they are victims of abuse or criminal behaviour. It is, therefore, important to use careful and sensitive listening and questioning skills to establish the situation when investigating concerns. Where translation is necessary, an interpreter should be employed.

3.2 Concerns about children

For concerns about a child or young person there is a legal obligation to follow all child protection guidelines, and the local designated Child Protection Lead should be contacted. Consent from the child is not required to do this, although it is good practice to seek it. Out of hours reporting should be to the Local Children's Social Services or the police.

3.3 Concerns about adults

Suspicions that an adult is a victim of modern slavery should be reported to the line manager who should then report the concerns to the Local Safeguarding Lead for advice.

Support for adult victims of human trafficking is available through the Salvation Army which holds the Ministry of Justice victim care contract for England and Wales. The Salvation Army has a 24-hour confidential helpline (**0300 303 8151**) for professional advice and support and referrals which operates seven days a week.

3.4 Consent

There is a legal obligation to gain consent from the person before you can refer them to another service.
Every adult must be presumed to have the mental capacity to give consent unless they are:

- Unable to take in or retain information provided about their treatment or care.
- Unable to understand the information provided.
- Unable to weigh up the information as part of the decision-making process.

There is however a legal obligation to take action to safeguard and protect any child or young person under 18 years who is at risk of abuse or exploitation and whilst desirable, consent is not required to report concerns to the appropriate authorities.

3.4 Reporting a case of modern slavery

To report a case of modern slavery, call the Modern Slavery helpline 0800 0121 700 or report it online on the Modern Slavery helpline website:
https://www.modernslaveryhelpline.org/report
The Local Safeguarding Lead should also be informed.

3.5 Accountability

All Day Lewis Group colleagues have a responsibility to complete safeguarding training at Level 1, specific to identification of individuals at risk of modern slavery and should raise concerns following the procedures laid out in this policy. This includes agency workers, temporary workers, students, and volunteers working for the company or with any service delivered or managed by the company.

Managers must follow local procedures and escalate any concerns raised to the appropriate local Safeguarding and Child Safeguarding lead. Managers who are recruiting must ensure that they follow all appropriate HR policies and that all Right to Work documentation has been checked and copied. Managers should seek advice when they are unsure of what to do in each situation. Managers have a duty to ensure that this policy is made available to all colleagues and that appropriate training is undertaken enabling all colleagues to understand their responsibilities.

Senior Managers have a responsibility to influence at a board level to ensure that there is an open and transparent culture within the company, and that working practices are reflective of best practice and adhere to all relevant legislation.

The Management Boards support staff training and development to help to identify and eliminate modern slavery practices.

This policy will be reviewed every 2 years, or sooner to reflect any change in recognised best practice or legislation.

Policy approved by:

Name:	Neil Hopkins	Position:	Head of People
Signature:	Neil Hopkins	Date:	31 March 2025