

Independence Matters Group

# Modern Slavery and Human Trafficking Statement

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Home Support  
Matters

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## Purpose

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Independence Matters CIC has taken to ensure that slavery and human trafficking are not taking place within its supply chains or in any part of its business. This statement relates to actions and activities during the financial year 1 April 2024 to 31 March 2025.

## Scope

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

## Statement

### Introduction from Zaliha Williamson, Managing Director

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

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

Modern slavery and human trafficking are incompatible with the values, beliefs, and commitment of the IM Group, which include being caring and acting with integrity. We fully support the government’s objective to eradicate modern slavery and human trafficking. We recognise the responsibility that we have as a large organisation that employs more than 700 colleagues.

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

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

## Organisational structure and supply chains

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

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

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

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

## Our Supply Chains

Our supply chains include:

- Agency staff
- Specialist professionals
- Contractors
- Cleaning products
- Suppliers of materials for Norfolk Industries products
- ICT Hardware and Software
- Office equipment and furniture
- PPE, workwear, and uniforms
- Stationery, books, publications, periodicals
- Vehicles
- Utilities

Our non-payroll spend comprises less than 10% of our annual cost base and where possible we build long-standing relationships with our key suppliers to mitigate risks.

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

## Responsibility

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

## Our Policies on Slavery and Human Trafficking policies

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

- Whistleblowing policy: protecting whistle blowers through our confidential reporting process
- Values Based Safer Recruitment Procedure and Policy
- Safeguarding policy: protecting from harm and promoting the wellbeing of young people and vulnerable adults.

## Ongoing Due Diligence

As part of its ongoing due diligence, IM Group will:

- raise awareness across the company of the risk of modern slavery
- promote and encourage reporting of any concerns using the Modern Slavery and Exploitation Helpline

- carry out robust recruitment processes and remain vigilant for signs of modern slavery when engaging candidates; especially those from overseas or vulnerable backgrounds
- regularly audit payroll details to check for indications of exploitation
- introduce awareness training on slavery and human trafficking risks to all teams within the IM Group.
- ensure we only contract with key suppliers that can demonstrate they behave in a manner that is consistent with our own core values.

## Enforcement of this Statement

Independence Matters Group will review this statement annually. This statement was approved by Independence Matters CIC Board on 14 November 2025.

**Tom Thornley**

**Chair, Independence Matters CIC**

