

Modern Slavery and Human Trafficking Statement

1. Introduction

Kingston Centre for Independent Living (KCIL) is committed to acting ethically and responsibly and to taking reasonable steps to prevent modern slavery and human trafficking within our organisation and our supply chains.

Modern slavery can include slavery, servitude, forced or compulsory labour and human trafficking. KCIL recognises that exploitation can occur in any sector and that organisations have a responsibility to remain alert to potential risks.

KCIL does not currently meet the turnover threshold which makes publication of a slavery and human trafficking statement mandatory under section 54 of the Modern Slavery Act 2015. We nevertheless publish this statement voluntarily as part of our commitment to good governance, safeguarding and responsible procurement.

2. About KCIL

KCIL is a user-led organisation supporting disabled people to live independently. We deliver services including Direct Payment support, Personal Assistant (PA) recruitment support, payroll and related services, information and advice, training and other services supporting independent living.

Our activities are undertaken principally in the UK.

Our supply chain is relatively limited and primarily consists of UK-based suppliers providing professional and operational services including:

- IT and telecommunications;
- software and digital services;
- office equipment and supplies;
- premises and facilities services;
- professional services and consultancy;

- training services; and
- cleaning and other contracted support.

Our suppliers change over time and therefore individual suppliers are not listed within this statement.

3. Our approach to modern slavery

KCIL has zero tolerance of slavery, human trafficking, forced labour or exploitation.

We expect employees, contractors and suppliers to act lawfully and ethically and we will take appropriate action where we become aware of practices which are inconsistent with these expectations.

Our approach is proportionate to the size and nature of our organisation and the risks associated with our activities.

4. Areas of potential risk

KCIL considers the risk of modern slavery within its direct operations and most of its immediate UK service suppliers to be relatively low.

However, we recognise that risks may exist further down supply chains, particularly in areas such as technology and electronic equipment, cleaning, facilities services, clothing and other manufactured goods.

KCIL also supports disabled people and families with the recruitment of Personal Assistants. PAs are normally employed directly by the disabled person or family rather than by KCIL.

Although KCIL is not the employer in these arrangements, we recognise that recruitment and employment relationships can potentially involve exploitation, coercion, financial abuse or unsafe employment practices. These risks overlap with our safeguarding responsibilities and are considered within our recruitment support, safeguarding procedures and advice to Direct Payment recipients.

5. Policies and procedures

A number of KCIL policies and procedures contribute to preventing, identifying and responding to modern slavery and exploitation. These include:

- Safeguarding Policy;
- Whistleblowing Policy;
- Recruitment and Selection Policy;
- Staff Code of Conduct;
- Equality, Diversity and Inclusion Policy;
- procurement and financial controls; and
- procedures relating to PA recruitment and Direct Payment support.

Staff are expected to raise safeguarding or other concerns promptly through the appropriate KCIL procedure.

Employees who raise concerns in the public interest are supported in accordance with KCIL's Whistleblowing Policy.

6. Recruitment and employment

KCIL is committed to fair and lawful employment practices.

Our recruitment processes include appropriate checks on an individual's identity and their right to work in the UK. Where required for a role, appropriate Disclosure and Barring Service checks are also undertaken.

KCIL does not charge employees recruitment fees and does not retain employees' passports or other identity documents.

When supporting Direct Payment recipients to recruit PAs, KCIL provides information and support intended to encourage lawful, fair and safe employment practices.

7. Suppliers and procurement

KCIL seeks to work with reputable suppliers and contractors and considers ethical, safeguarding and employment issues where these are relevant to the goods or services being purchased.

The level of due diligence undertaken is proportionate to the nature, value and potential risk of the contract.

Where appropriate, KCIL may consider matters such as:

- the supplier's employment practices;
- safeguarding arrangements;
- modern slavery statements or policies;
- use of subcontractors;
- relevant accreditations or assurances; and
- any identified concerns regarding labour or human-rights practices.

If KCIL identifies a credible concern relating to modern slavery within a supplier or contractor, we will investigate the concern and determine appropriate action. Depending on the circumstances, this may include seeking further information, requiring remedial action, reconsidering the relationship or reporting concerns to the appropriate authorities.

8. Reporting concerns

Staff, volunteers, service users, suppliers or other individuals who become aware of suspected modern slavery or exploitation connected with KCIL should report the concern to an appropriate member of KCIL's management team.

Where the concern relates to the safety or welfare of an individual, KCIL's Safeguarding Policy and procedures will apply.

Where someone is in immediate danger, the police should be contacted on 999.

Concerns about suspected modern slavery can also be reported to the Modern Slavery & Exploitation Helpline.

KCIL will handle concerns sensitively and will not tolerate victimisation of individuals who raise genuine concerns in good faith.

9. Training and awareness

KCIL will ensure that employees whose roles involve safeguarding, recruitment, procurement or other activities where modern-slavery risks may arise have appropriate awareness of those risks and know how concerns should be reported.

Modern slavery will be considered alongside relevant safeguarding and recruitment training rather than necessarily operating as a separate training programme.

10. Monitoring and review

KCIL will keep its approach to modern slavery under review and will consider whether changes to its services, procurement activities or risk profile require additional controls.

This statement will be reviewed periodically and updated where there are significant changes to KCIL's activities, relevant risks or legal requirements.

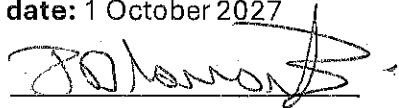
11. Approval

This Modern Slavery and Human Trafficking Statement has been approved by the KCIL Board of Trustees.

Approved: 1 October 2026

Review date: 1 October 2027

Signed:



Chief Executive / Chair of Trustees

Kingston Centre for Independent Living