



Exploitation in the Care Sector Flow Chart (ECS)

1. Cumberland Council and Westmorland and Furness Council will have dedicated inboxes created for ECS concerns. Access to the inboxes will include the following:
 - Adult Social Care Safeguarding teams.
 - Adult Social Care Commissioning Teams.
 - Adult Social Care Quality and Contract Officers.
2. Cumbria Constabulary also have a dedicated inbox relating to Modern Day Slavery concerns. This inbox can be used for the purposes of ECS concerns.
3. There is always the potential that an ECS concern can come to light via a S42 enquiry. If a ECS concern comes to light via this route, the ASC Safeguarding Team will notify the Commissioning and Quality and Contract teams in the same manner as if they had a concern with a care provider.
4. Cumberland Council and Westmorland and Furness Council's public facing websites will be updated to include the email address for ECS concerns.

A concern coming to light

1. An ECS concern could come to light by way of:
 - Whistleblowing.
 - Intelligence from the Home Office or UK Visa and Immigration.
 - Police alert.
 - Intelligence gathered by another statutory agency – NHS, Social Care, Fire and Rescue.
 - Voluntary and Third Sector Organisations*
 - Care Quality Commission.
 - Housing.
 - Environmental Health.

****this list is not exhaustive.***

2. The recipient of an ECS concern will start their own organisational intelligence gathering process and notify other relevant agencies of the concern to allow for information sharing to commence.

3. Based on information established, a larger multi-disciplinary meeting might need to be convened for the purposes of:

- further information sharing.
- Planning next steps (such as contact with individuals).
- Identifying any immediate safeguarding actions (out with of S42 of the Care Act, 2014).

- Consideration of other agencies that might need to be included to support the enquiry (GLA, Minimum wage team).

Who is the lead agency

1. Initial response to a concern will be generated by the data controller – the person who first receives the concern.
2. The data controller will notify relevant agencies it believes need to be involved through the relevant agency inbox.
3. The on-going lead agency will determine by the intelligence shared and outcome of multi-disciplinary discussion or meeting.
4. A ECS concern might run alongside a statutory S42 enquiry, or it might be consumed into the statutory enquiry if there is evidence that ECS victims appear to have care and support needs.

Outcomes from a ECS concern

1. The commissioner of support will ensure that there are appropriate due diligence checks in relation to the standard of care delivery. This could involve the following:
 - Bringing forward contract monitoring reviews.
 - Unscheduled visits.
 - Dip sampling of recent reviews.
 - Analysis of recent data.
2. If there are concerns around the standard of care, out with of S42 process, standard ASC quality processes will be implemented.
3. ASC contract and compliance team will carry out contract compliance checks to establish whether nature of the concern constitutes a contract breach – this could include a visit to the registered service/registered office.
4. Any contractual breaches or concerns around the standard of care might require further MDT discussion to consider next steps.
5. Law enforcement agencies or statutory enforcement agencies will consider any powers they have available/need to enact on the basis of the concern. The actions taken by a enforcement body might result in the Council considering on-going contractual arrangements (consideration of reputational damage).

ECS Process

