

MODERN DAY SLAVERY POLICY

Version 1.1

Effective 21st October 2023

Reviewed 8th January 2025

Next Review Date 1st June 2026

1. Introduction

VCare 24 Ltd is committed to the eradication of modern slavery and human trafficking within its operations and supply chain. Whilst we are an exempt organisation under the Modern Day Slavery Act 2015 we recognise our responsibility to uphold and support the principles and requirements of the Act and best practice.

This policy outlines our commitment to ensuring compliance and preventing any form of modern slavery within our organisation and our supply chain.

2. Scope

This policy applies to all employees, contractors, subcontractors, suppliers, and any other parties associated with VCare24. It encompasses all operations and activities within the United Kingdom.

3. Objectives

a. Compliance with the Modern Slavery Act

VCare24 Ltd will comply with all legal obligations under the Modern Slavery Act 2015, ensuring transparency and accountability in our efforts to prevent and eliminate modern slavery within our organisation and supply chain.

b. Risk assessment and Due Diligence

VCare24 Ltd will conduct risk assessments to identify and evaluate areas of potential modern slavery risk within our operations and supply chain. Due diligence processes will be established to assess suppliers and contractors. Our current risk assessment is in Appendix 1.

c. Training and Awareness

All employees and relevant stakeholders will receive training during their induction to recognise the signs of modern slavery and understand their responsibilities in addressing it. This includes clear guidance on reporting any concerns or suspicions.

Those who complete procurement activities are provided with further information regarding awareness of modern slavery in supply chains.

d. Reporting Mechanisms

VCare24 Ltd will implement effective reporting mechanisms for employees, suppliers, and other stakeholders to raise concerns regarding modern slavery without fear of retaliation. Reports will be thoroughly investigated.

Reporting is expected to be received via the Grievance or Whistleblowing Policy however, it would be accepted in any format.

e. Supplier Engagement

We will engage with our suppliers and contractors to ensure they are committed to complying with the Modern Slavery Act. We will encourage them to implement their own policies, procedures, and training.

We ensure that suppliers declare compliance with the Modern Slavery Act 2015, where they do not have easily accessible policies and information on the steps they take to reduce modern slavery (Appendix 2).

f. Continuous Improvement

VCare24 Ltd is dedicated to regularly reviewing and enhancing our policies, procedures, and due diligence measures to adapt to changes in legislation, industry best practices, and emerging risks.

4. Responsibilities

Board of Directors: The Board of Directors has ultimate responsibility for the effective implementation of this policy.

Senior Management: Senior management is responsible for ensuring that the policy and its procedures are embedded into all aspects of VCare's operations.

Employees: All employees are expected to be vigilant, report concerns, and adhere to this policy and associated procedures.

Suppliers and Contractors: Suppliers and contractors are expected to adhere to our expectations regarding compliance with the Modern Slavery Act and take steps to prevent modern slavery within their own operations and supply chains.

5. Reporting

Any employee or stakeholder who believes or suspects that modern slavery, human trafficking, or related activities are taking place within [Company Name] should immediately report their concerns to their manager, Human Resources, or through our designated reporting channels.

6. Review

This policy will be reviewed annually or as needed to ensure its continued effectiveness and compliance with the Modern Slavery Act 2015 and any relevant updates in legislation.

7. Conclusion

VCare24 Ltd is committed to promoting ethical and responsible business practices and upholding the principles of the Modern Slavery Act 2015. We are dedicated to maintaining a culture of transparency, accountability, and continuous improvement in our efforts to eliminate modern slavery.

DOCUMENT CONTROL

See table below for document control.

Version:	1
Authored by:	Chloe Roberts
Date implemented:	8 th January 2025
Review date:	1 st June 2026
Audited Yes/No – <i>if yes name of auditor and date.</i>	No

APPENDIX 1

Modern Day Slavery Risk Assessment for VCare24 Ltd

1. Introduction

This risk assessment has been designed for a VCare24 that other than large corporations, such as Amazon or Microsoft who have robust risk assessments and modern slavery procedures in place, works predominantly with other SMEs and independent contractors, to assess potential risks related to modern slavery and human trafficking, in compliance with the Modern Slavery Act 2015. The purpose of this assessment is to identify areas where modern slavery could occur and to help mitigate those risks through best practices.

2. Scope

The risk assessment covers the following:

- **Supply Chain:** SMEs with which the company works and from whom goods/services are procured.
- **Workforce:** Independent contractors, consultants and safer recruitment of permanent staff.
- **Outsourcing & Subcontracting:** Third parties hired for specific tasks or projects.
- **Geographic Considerations:** Operations or third-party services in regions with higher risks of modern slavery.

3. Risk Factors to Consider

- **Geography:** Some regions are more prone to human trafficking and forced labour. If operations or third-party suppliers are in high-risk areas, they may present a higher risk of modern slavery.
- **Industry:** Certain industries, such as agriculture, construction, textiles, and manufacturing, are more prone to modern slavery due to the demand for low-wage, manual labour. Assessing the specific industries that our suppliers and contractors operate in is crucial – as a health and social care organisation who is an SME predominantly we purchase from large multi nationals or small local suppliers.

- **Size of Third-Party Organisations:** Smaller SMEs may lack the resources or systems in place to monitor their own supply chains or workforce for signs of modern slavery.
- **Labour Conditions:** Low-wage, migrant, or temporary labour are common factors linked to modern slavery. Independent contractors may also be at higher risk if they work in isolation or under unclear terms.
- **Third-Party Due Diligence:** Inadequate vetting or monitoring of subcontractors and independent contractors can lead to unknowingly engaging with companies or individuals involved in exploitation.

4. Steps for Risk Assessment and Mitigation

Step 1: Conduct Supplier and Contractor Due Diligence

- **Supplier Audits:** We verify that all suppliers, subcontractors, and independent contractors adhere to ethical labour practices. This includes having a modern slavery policy and being transparent about their supply chains. Consider conducting audits of key suppliers and asking them to provide certifications or documentation demonstrating compliance.
- **Declarations:** We send out modern slavery declarations to contractors, suppliers, and subcontractors, requiring them to disclose information about their labour practices. Ensure that they agree to a modern slavery-free policy in their operations.
- **Certifications and Standards:** Look for certifications such as ISO 20400 (Sustainable Procurement), Ethical Trading Initiative (ETI) membership, or adherence to the Fair Labour Association standards, which indicate a commitment to eliminating modern slavery.

Step 2: Assess Internal Workforce Risks

- **Contractor Agreements:** Ensure that contracts with independent contractors clearly outline terms of employment, compensation, working hours, and provide for fair treatment. Vet the contractor's background to ensure that they are legitimate and have no history of exploiting workers.
- **Worker Visibility and Rights:** Maintain open lines of communication with all contractors and workers, ensuring that they understand their rights under UK employment law, including the right to report issues confidentially.
- **Safer Recruitment of Permanent Staff:** As we provide regulated activities by the CQC and Ofsted our safer recruitment processes are robust. We have as standard built into our Safer Recruitment processes steps to ensure we assess the risk of

candidates of modern slavery, eg. our system will flag if staff have same bank accountants a common occurrence in modern slavery.

Step 3: Strengthen Transparency and Accountability in Supply Chain

- **Supply Chain Mapping:** We have mapped our supply chain to identify where risks might be more pronounced. We understand who our direct suppliers are and whether they rely on sub-suppliers or independent contractors.
- **Engage with Higher-Risk Suppliers:** For suppliers operating in high-risk industries or regions, engage in deeper discussions about their efforts to address modern slavery risks we look for any signs that they may be involved in exploitative practices.

Step 4: Implement Monitoring and Reporting Mechanisms

- **Whistleblower Policy:** We have an established whistleblower policy, ensuring that employees and contractors can confidentially report concerns about modern slavery without fear of retaliation.
- **Regular Monitoring and Follow-up:** We regularly monitor suppliers, contractors, and other third parties. This can include site visits or third-party inspections to ensure that labour conditions comply with modern slavery-free standards.

Step 5: Provide Training and Raise Awareness

- **Staff Training:** We ensure that employees, especially those involved in procurement, HR, and contractor management, are trained to spot the signs of modern slavery and understand how to take action if they suspect any form of exploitation. All staff and new starters complete training regarding safeguarding and exploration and this includes identifying and managing the risks of modern slavery.
- **Contractor Awareness:** We educate independent contractors and SMEs on the risks of modern slavery and the company’s commitment to ethical business practices.

5. Risk Rating and Action Plan

Risk Area	Risk Level	Action Required
Supply Chain Transparency	Medium	Conduct audits for high-risk suppliers and implement a supplier code of conduct.
Independent Contractors	Low-Medium	Review contracts and implement a screening process.

Subcontracting Practices	Medium	Monitor and enforce ethical policies across all subcontractors.
Geographic Location (High-Risk Areas)	High	Implement stricter due diligence and enhanced monitoring for contractors from high-risk regions when delivering services / setting up new bases in these areas.
Employee/Contractor Awareness	Low	Conduct annual modern slavery training and provide educational resources.

6. Audit and KPIs

Annually the HR / Finance Department will audit and report against the below KPIs for the Directors to assess the effectiveness of this policy:

1. Compliance rates as a % of staff training
2. Returned supplier declarations
3. Number of reported Modern Day Slavery concerns
4. Action taken to resolve the above / outcomes
5. Updated supply chain mapping

7. Conclusion

This risk assessment should be reviewed regularly to ensure ongoing compliance with the Modern Slavery Act 2015 and best practice standards. By following these best practices and engaging in proactive monitoring, SMEs can significantly reduce the risk of modern slavery in their operations, supply chains, and contractor engagements.

APPENDIX 2

Modern Slavery Compliance Declaration

VCare24 Modern Slavery Policy & Modern Slavery Act 2015 Compliance Declaration

We, the undersigned, hereby confirm that our business complies with the Modern Slavery Act 2015 and fully adheres to VCare24's Modern Slavery Policy. We recognise the importance of preventing modern slavery and human trafficking within our operations and supply chains and have taken all necessary steps to ensure compliance.

We declare that:

1. **Commitment to Ethical Practices:** Our business is committed to ensuring that modern slavery and human trafficking are not present in our own operations, supply chains, or any part of our business dealings.
2. **Compliance with Modern Slavery Act 2015:** We have reviewed the Modern Slavery Act 2015 and have taken appropriate measures to ensure our business is fully compliant with the legal requirements, including the publication of an annual Modern Slavery Statement where required.
3. **Supply Chain Due Diligence:** We have implemented due diligence procedures to ensure that our suppliers and contractors adhere to anti-slavery and anti-human trafficking principles. This includes vetting new suppliers and ensuring that existing suppliers are compliant with our Modern Slavery Policy.
4. **Policies and Training:** Our employees and contractors have received relevant training on recognising and responding to potential modern slavery risks. We also maintain clear policies and processes to address any concerns or incidents of modern slavery.
5. **Reporting and Whistleblowing:** We have established a confidential reporting system for any employee, contractor, or third party to raise concerns regarding modern slavery. These concerns will be taken seriously, investigated promptly, and acted upon accordingly.
6. **Ongoing Review and Monitoring:** We are committed to regularly reviewing and improving our practices to ensure we continually meet our obligations under the Modern Slavery Act 2015 and VCare24's Modern Slavery Policy.

By signing this declaration, we confirm that all the information provided is accurate and that we are fully committed to preventing modern slavery in all aspects of our business operations.

Signed by:

Name of Business: VCare24

Business Address:

Business Registration Number:

Name of Authorised Signatory:

Position/Title of Signatory:

Signature:

Date:

This declaration form should be returned to VCare24 to confirm your business's compliance.

Thank you for your commitment to eradicating modern slavery and human trafficking.