

Modern Slavery Policy Document number: PP/ACG /H01 Version 1	
Summary	Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Active Care Group has a zero-tolerance approach to any form of modern slavery and human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chains. This policy sets out the steps that Active Care Group has taken and is continuing to take to ensure that modern slavery is not taking place within our business or supply chain.
Scope	This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, agents, contractors and suppliers.
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Modern Slavery Policy

1. Introduction

- 1.1. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, agents, contractors and suppliers. This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Active Care Group Ltd has taken and is continuing to take to ensure that modern slavery is not taking place within our business or supply chain.
- 1.2. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Active Care Group has a zero-tolerance approach to any form of modern slavery and human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chains.
- 1.3. Active Care Group implements its business strategy in an ethically, socially and environmentally responsible manner. We fully acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights. The IBHR informs all of our policies related to the rights and freedoms of every individual who works for us, either as a direct Active Assistance employee, locum or agency worker or indirectly through our supply chain. Respect for the dignity of the individual – and the importance of each individual's human rights – form the basis of the behaviours we expect in every workplace nationally.
- 1.4. We will not accept any form of discrimination, harassment or bullying and we require all of our managers to implement policies designed to increase equality of opportunity and inclusion for all Active Care Group employees including locums and agency workers. As a Health and Care provider we recognise our responsibility to identify any employees, customer's or patients who may be a victim of modern slavery or human trafficking and we will ensure we adhere to our robust safeguarding procedures in work with our partners in following local modern slavery processes.

2. Scope

- 2.1. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, agents, contractors and suppliers. This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Active Care Group Ltd has taken and is continuing to take to ensure that modern slavery is not taking place within our business or supply chain.

3. Responsibility for this statement

- 3.1. Ultimate responsibility for the prevention of modern slavery rests with the Company's Executive Board. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

4. Policies

- 4.1. This policy should be read in conjunction with ACG policies as well as legislative and regulatory requirements.
- 4.2. ACG operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:
 - 4.2.1. Staff Safety and Treatment at Work Policy where we confirm that we will not tolerate or condone abuse of employees within any part of our business or within supply chains and will take seriously any allegations.
 - 4.2.2. Whistleblowing Policy, aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully

investigated and appropriate remedial actions taken and we will work closely with our social care and health partners ensuring our safeguarding policies and procedures dovetail with local procedures and best practice.

- 4.2.3. A robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard.
- 4.2.4. Employee Code of Conduct consistent with any professional codes of conduct.

5. Direct Communication

- 5.1. The Company encourages members of the public or people not employed by us to write, in confidence, to the Group HR Director to raise any concern, issue or suspicion of modern slavery in any part of our business.

6. Suppliers

- 6.1. We expect all our suppliers to be able to evidence that they have never been convicted of offenses relating to modern slavery and we will include our anti-slavery policy as part of any contract with all suppliers and they will be required to confirm that no part of their business operations contradicts this policy.
- 6.2. In addition to the above, as part of our contract with suppliers, we will require that they confirm to us that:
 - They have taken steps to eradicate modern slavery within their business
 - They hold their own suppliers to account over modern slavery
 - For UK based suppliers, they pay their employees at least the national minimum wage / national living wage (as appropriate) and to ensure that within their own supply chains, where UK based suppliers have overseas supply chains, that their employees pay is consistent with their national minimum wage requirements, working conditions are safe and fair, there is no child labour and working hours are not excessive.

- We may terminate the contract at any time should any instances of modern slavery come to light.

7. Risk assessments

- 7.1. Our supply chains include procurement of agency staff, medical consumables, facilities maintenance, utilities and waste management. We will conduct an annual risk assessment and will ensure we will take further steps to ensure we support the eradication modern slavery, that staff understand how to recognise modern slavery and the appropriate safeguarding reporting processes are followed should there be concerns within our supply chains, with customers or patients.

8. Safeguards

- 8.1. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- 8.2. The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

9. Assessment of effectiveness in preventing Modern Slavery

- 9.1. We understand that Modern Slavery risk is not static, and will continue our approach to mitigating this risk. We will do this by reviewing our supplier procurement processes to

ensure they align our procurement processes to the principles of Ethical Trading for Healthcare and will review the training provision for the procurement team and care and clinical teams. We will publish this statement on our website and will review progress annually.

10. Training Requirements

10.1. It is the responsibility of Heads of Department and Line Managers to ensure that all staff are aware of and understand the importance of this policy.

11. Policy Review Statement

11.1. This document may be reviewed at any time at the request of either staff or management, but will automatically be reviewed 3 years from initial approval and thereafter on a triennial basis unless organisational changes, legislation, guidance or non-compliance prompt an earlier review.

12. Associated Documents

- Safeguarding Adults Policies
- Whistle Blowing Policy
- Mental Capacity Act and Deprivation of Liberty Policy
- Managing Complaints, Concerns and Compliments Policy
- Incidents, Serious Incidents and Escalation Policy
- Reporting Incidents to External Organisations
- Staff Safety and Treatment at Work Policy
- Code of Conduct

13. Associated References and Further Guidance

- Modern Slavery Act 2015
- Human Rights Act 1998
- Equalities Act 2010
- Mental Capacity Act 2005 and Deprivation of Liberty Safeguards 2017
- Care Quality Commission
- Care Inspectorate Scotland
- Care Inspectorate Wales

14. Audit and Monitoring

Objective	Lead	Measure	Frequency	Reporting
To investigate and report all trafficking or slavery concerns to external organisations	Group HR Manager Safeguarding Whistleblowing	Number of reports registered	As required	Quality and Governance Reports