

Modern and Anti-Slavery Policy

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Version History

Version No.	Author/Editor	Approved by	Date Issued	Next Review Date	Brief Summary of Changes
1	Lorraine Miranda	Stephen Mungofa	01.04.2025	31.05.2028	New Statement

1. Introduction

This statement is made pursuant to s54 of the Modern Slavery Act 2015 and sets out the steps that Constant Healthcare Limited has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Constant Healthcare Limited has a zero-tolerance approach to any form of modern slavery. 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 chain.

2. Policy Statement

This policy describes the values, principles and procedures that underpin Constant Healthcare Limited's approach to any situation where it becomes aware of, or has evidence of, involvement or the risk of involvement, direct or indirect, in enterprises that subject people to conditions that meet current definitions of modern slavery, human trafficking and forced labour. It applies to this care service and all other organisations with which it has dealings.

It is written in line with the safeguarding duties of local authorities under the Care Act 2014 (and equivalent applicable devolved government laws) to ensure any vulnerable adult is not subject to abuse by being a victim of modern slavery or forced labour, nor to any form of human trafficking or, for example, being coerced into any illegal activity.

It is also written to reflect the aims of the Modern Slavery Act 2015 that sets out the responsibilities and duties of corporate businesses and charities to prevent and avoid any dealings with any network or organisation implicated in modern slavery or human trafficking and to alert the police and other responsible authorities if they come across it. Constant Healthcare Limited understands that unless its total annual turnover is over £36 million it will not be subject to the Act's annual reporting requirements.

3. Aim of this statement

The aim of this statement is to demonstrate that Constant Healthcare Limited follows good practice and all reasonable steps are taken to prevent slavery and human trafficking. All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking, with the Finance Department taking the lead responsibility for compliance in the supply chain.

4. About the organisation

Constant Healthcare Limited provides domiciliary care services to adults in the community. We provide care to people in their own homes and occasionally in care homes that are unable to provide certain elements of care, for example personal care.

Our policies on slavery and human trafficking:

Constant Healthcare Limited is aware of our responsibilities towards service users, employees and the local community and expects all suppliers to adhere to the same ethical principles. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships.

Currently, all awarded suppliers sign up to our terms and conditions of contract which contain a provision around Good Industry Practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains; and that they conduct their businesses in a manner that is consistent with this modern anti-slavery policy.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- 4.1 Safer Recruitment Policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, to safeguard against human trafficking or individuals being forced to work against their will

- 4.2 Equality, Inclusion and Diversity Policy.** We have a range of controls to protect staff from poor treatment and/or exploitation, which complies with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities

- 4.3 Safeguarding Policies.** We adhere to the principles inherent within both our safeguarding children and adult's policies. These provide clear guidance so that our employees are clear on how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.

- 4.4 Whistleblowing and Freedom to Speak Up Policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people

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receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals

4.5 Standards of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

These and other internal policies are in place, to protect those that we work with from modern day slavery and human trafficking ensuring that:

- Staff can report concerns about slavery and human trafficking and management will act upon them in accordance with our policies and procedures.
- All staff have a responsibility to consider issues regarding modern slavery and incorporate their understanding of these into their day-to-day practices.
- Staff are able to raise concerns through the Whistleblowing
- and Freedom to Speak Up Policy, about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisal.
- Advice and training about slavery and human trafficking is available to staff through the Safeguarding Team.

5. People using our service

As a domiciliary care service, we ensure no vulnerable young person or adult in our care is subject to any conditions that meet the Care Act (and similar) definitions of modern slavery. If the service has any suspicions, information or evidence that any of the people using its services are victims of, or at risk of, becoming victims of modern slavery, exploitation or forced labour, it will take immediate protective action by alerting the appropriate safeguarding authority or police and apply all safeguarding procedures that then follow.

6. Staff

We also do not employ staff under any conditions that might make us vulnerable to accusations or suspicions that we are employing people under conditions that would amount to modern slavery and exploitation as defined. All staff are subject to recruitment procedures that comply with both employment law and regulatory requirements with pay and conditions of employment that meet all statutory requirements.

If we have evidence that any of our employees are subject to exploitation and forced labour by third parties, we will exercise our duty of care to our employees by reporting our concerns as whistleblowers to the police or local unit responsible for investigating modern slavery to decide on further investigation or action. We will not act or discriminate against the employee if they are

meeting all the required employment conditions and had been recruited in line with the service's recruitment procedures.

7. Contactors and suppliers

As a domiciliary care service we inevitably deal with several outside organisations as suppliers of goods and services. We know that these organisations might form part of a longer supply chain. We make all reasonable efforts to ensure that no link in the supply chain is producing goods and services made under conditions of modern slavery or which might involve human trafficking.

We expect all our contractors and suppliers to have a similar zero-tolerance and due diligence approach to modern slavery and human trafficking and only work with organisations that have robust anti-modern slavery policies that operate in other parts of their supply chain and who comply with the Modern Slavery Act 2015.

We explain in our replies to businesses who respond to tenders and adverts for goods and services that we will check if they employ people under conditions of modern slavery and if they do similar checks with other businesses in their supply chain. In doing so, we expect those businesses to have taken all reasonable efforts to exclude their suppliers from colluding with modern slavery practices.

All staff members, particularly those responsible for procuring goods and services, are expected to report any concerns about any issue or suspicion of modern slavery in any parts of their dealings at the earliest possible stage.

Anyone raising concerns about slavery or human trafficking that affects Constant Healthcare Limited will be protected by the service's whistleblowing policy.

8. Training

Advice and training about modern slavery and human trafficking is available to staff through our mandatory safeguarding children and adults training programmes, our safeguarding policies and procedures, and our safeguarding leads. It is also discussed at our compulsory staff induction training.

We are looking at ways to continuously increase awareness within our organisation and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

9. Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

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- No reports are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

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APPENDIX 1: Equality Impact Assessment

The organisation aims to design and implement policies and procedures that meet the diverse needs of our service and workforce, ensuring that none are placed at a disadvantage over others, in accordance with the Equality Act 2010. Consideration has been given to the impact this policy might have with regard to the individual protected characteristics of those to whom it applies.

Ref #	Question	Yes	Comments
		No	
		N/A	
1	Does the document/guidance affect one group less or more favourably than another on the basis of:	No	
	Age	No	
	Race/Ethnic origins (including Gypsy, Roma and Traveller)	No	
	Sex (man or woman)	No	
	Gender Reassignment	No	
	Pregnancy/Maternity	No	
	Religion or Belief	No	
	Sexual orientation including lesbian, gay and bisexual people	No	
	Marriage/Civil Partnership	No	
	Disability - learning disabilities, physical disability, sensory impairment and mental health problems	No	
	Carers	No	
2	Is there any evidence that some groups are affected differently?	No	
3	If you have identified potential discrimination, are there any exceptions valid, legal and/or justifiable?	No	
4	Is the impact of the document/guidance likely to be negative?	No	

5	If so, can the impact be avoided?	N/A	
6	What alternative is there to achieving the document/guidance without the impact?	N/A	
7	Can we reduce the impact by taking different action?	N/A	
For advice in respect of answering the above questions or if a potential discriminatory impact has been identified, please contact Equality and Diversity Lead.			
Names and Organisation of Individuals who carried out the Assessment: Please give contact details.			Date of the Assessment
Name & Job Title: Stephen Mungofa, Director			01.04.2025