
POLICY AND ANNUAL STATEMENT 2025/26

Modern slavery and human trafficking

Home Care Providers Limited

Company number 11471441 | Financial year ended 31 March 2026

This policy and annual statement applies across our business, workforce and supply chains. It sets out our commitment to preventing modern slavery, the steps taken during the reporting year and our priorities for continuous improvement, with reference to section 54 of the Modern Slavery Act 2015.

1. Our commitment to people

Healthcare depends on people being able to trust one another. Every person who comes to us for work should be treated with dignity, paid fairly and able to make choices about their own life. Our workers support people and families at vulnerable moments. We owe those workers the same care and respect that we expect them to show others.

Modern slavery is an abuse of a person's freedom and dignity. Its effects can reach beyond the individual to their family and community. We reject exploitation in every form and want people to feel safe telling us when something is wrong, without fear that they will lose work or be treated unfairly.

Our responsibility extends to the way we recruit, the way workers are paid and the organisations we choose to work with. We recognise that exploitation can be concealed within otherwise legitimate employment and supply arrangements. We will listen carefully, act on warning signs and work with workers, clients, suppliers and safeguarding partners to prevent harm and support people affected.

2. Our business and supply chains

We provide home care and community based care, including complex care for adults and children. Care is delivered in people's own homes and may involve individuals who depend on others for personal care, communication, mobility or access to support.

We recruit our workers directly. Our employment and payment arrangements include PAYE and approved umbrella companies. Our supply chain also includes the external services and goods used to run the business. Direct recruitment reduces intermediary risk but does not remove the possibility of coercion, debt or exploitation outside our recruitment process.

Our supplier review will cover the services and products used in our operations, including technology, outsourced business support, professional services, premises services and business supplies where used. It will consider where work is carried out and goods are sourced, including any overseas links.

This statement covers Home Care Providers Limited. The board remains accountable for its workforce and supply chain where Finance, Payroll or compliance services are shared with related businesses.

3. Policy, legal duties and accountability

We do not tolerate slavery, servitude, forced or compulsory labour, human trafficking or related exploitation. These standards apply to directors, internal staff, healthcare workers and business partners.

- Work must be freely chosen. We prohibit forced, bonded, child and involuntary prison labour, deposits or lodging identity papers with an employer. Workers must control their documents and pay and be free to leave after reasonable notice.
- Workers must not be charged recruitment fees for obtaining work with us. Terms, pay and any lawful deductions must be clear. Commercial urgency must not override worker protection.
- Physical or verbal abuse, threats, sexual or other harassment and intimidation are prohibited. No person may suffer retaliation for honestly reporting a concern or cooperating with an investigation.

Relevant legislation

We are committed to meeting the following legal requirements, as amended and applicable to the work and jurisdiction:

Legislation	How it relates to this policy
Modern Slavery Act 2015, including section 54	Address slavery and trafficking risks in our business and supply chains, and report the steps taken through an annual statement with the required approval, signature and publication arrangements.
Employment Agencies Act 1973 and Conduct of Employment Agencies and Employment Businesses Regulations 2003	Protect work seekers through recruitment standards, clear terms and pay information, appropriate checks and the prohibition on charging healthcare workers fees for finding them work.
National Minimum Wage Act 1998 and Working Time Regulations 1998	Support lawful pay and compliance with applicable working time, rest and paid leave entitlements. Pay or working time concerns may also reveal wider exploitation.
Employment Rights Act 1996, including protections introduced by the Public Interest Disclosure Act 1998	Respect protection from detriment and dismissal for qualifying protected disclosures. Our policy also prohibits retaliation against anyone honestly raising an exploitation concern.
Equality Act 2010	Protect against unlawful discrimination, harassment and victimisation in recruitment and employment.

Relevant contractual obligations and NHS employment check standards also inform our controls. Compliance must check territorial requirements for services outside Great Britain.

Accountability

The board oversees this policy, significant risks and the annual statement. Compliance coordinates implementation, risk records and corrective actions. Finance maintains the approved umbrella supplier list. Payroll carries out umbrella checks and provides Key Information Documents. Managers must apply the policy and escalate concerns promptly.

The Registered Manager and clinical team lead care related safeguarding and welfare responses. Supporting policies and reporting routes are in sections 4 and 8.

4. Our supporting policies and procedures

Preventing exploitation depends on the standards we apply throughout a person's relationship with us. The following policies and supporting documents address recruitment, fair treatment, safe reporting and protection from harm. Compliance must maintain the controlled versions applicable to this company, including documents administered through shared services.

Policy or supporting document	How it supports this statement
PE07 - Modern Slavery and Human Trafficking Policy and Procedure	Provides operational guidance on recognising exploitation, responding to concerns and protecting people. This annual statement supplements the operational policy and records the reporting year controls and improvement priorities.
PM11 - Raising Concerns, Freedom to Speak Up and Whistleblowing Policy and Procedure	Provides a route for concerns about wrongdoing and protection for people who speak up. The contacts in section 8 provide a direct and alternative route for modern slavery concerns.
CR74 - Safeguarding Adults Policy and Procedure	Sets out how to recognise and respond to abuse of adults at risk, including modern slavery, and how to work with safeguarding partners.
AR01 - Safeguarding Children and Child Protection Policy and Procedure	Sets out recognition, referral and protection arrangements for children, including where there are concerns about trafficking or exploitation.
QQ03 - Complaints, Suggestions and Compliments Policy and Procedure	Enables people receiving care, families, staff and others to raise concerns. Complaints suggesting exploitation must also follow safeguarding and modern slavery reporting arrangements.
Staff Training Policy for Safeguarding in Complex Care	Supports role appropriate knowledge and recognition of harm in community care. Training records and renewal requirements inform the effectiveness review in section 10.

Keeping the policies connected

Staff must use the current controlled versions available through Compliance. Compliance is responsible for checking applicable versions, review dates and reporting contacts, and keeping these documents consistent with this statement. Policies and worker communications must be reviewed when the law, contractual obligations or our arrangements change.

A person does not need to know which policy applies before asking for help. Any concern suggesting coercion, forced labour or trafficking must be escalated promptly using section 8, even if first raised as a complaint, pay query or incident.

5. Risk assessment and management

Our assessment focuses on where people could be exploited, how concerns could remain hidden and how our controls help prevent or identify harm. The review brings together our reporting year controls and priorities for continuous improvement.

Risk in our business or supply chain	Controls during the reporting year	Ongoing management and review
Recruitment and access to work Hidden recruitment debt, fees paid to third parties, retained documents or another person controlling a worker's choices.	Workers were recruited directly. Modern slavery formed part of mandatory training for internal staff and healthcare workers. Complaints could be raised through existing procedures.	Extend onboarding with specific confidential questions about fees, document retention and control of pay, including any involvement of outside parties.
Umbrella companies and pay Unclear deductions, withheld wages or third party control over money could create dependency or disguise exploitation.	PAYE and approved umbrellas were used. Established, rigorous due diligence was overseen by Finance and Payroll. Finance maintained the approved list; Payroll carried out checks and provided Key Information Documents.	Continue the established due diligence and monitoring arrangements. Keep approval records current and escalate pay concerns, unexplained deductions or coercion indicators.
People receiving care at home Isolation, disability or dependence may allow another person to control money, documents, contact with others or access to care. Domestic servitude or other exploitation may be concealed.	Risk assessments took place when care packages were awarded. Clinical and senior staff made drop in visits. Welfare calls and an out of hours service provided further opportunities to identify concerns. Safeguarding procedures address modern slavery.	Make exploitation indicators explicit in care assessments and reviews. Seek the person's views safely, taking communication needs into account, and use the safeguarding route for their location.
Other suppliers and deeper supply chains Exploitation may occur in outsourced services or in the manufacture and supply of business goods, beyond the immediate supplier.	Finance maintained the approved umbrella list and Payroll carried out checks on the companies used to pay workers.	Map active suppliers and prioritise checks by labour intensity, location, sourcing and warning signs. Apply the supplier management commitments on page 5.
Hidden concerns and barriers to reporting Fear of losing work, language barriers or dependency on another person can prevent disclosure.	Mandatory training and complaints arrangements were in place. HCP also had a documented Freedom to Speak Up and Whistleblowing procedure.	Promote the named and alternative reporting contacts, protect confidentiality as far as possible and record concerns even where exploitation is not substantiated.

The risk review must be revisited when services, suppliers or payment arrangements change, when warning signs arise and during the annual review.

6. Responsible supply chain management

We want to work with organisations that respect the people whose work makes their services possible. Cost, convenience or the urgency of a staffing requirement must not justify exploitative practices. Responsible purchasing depends on understanding our suppliers and being prepared to act when concerns arise.

Recruitment and payment controls

During the reporting year, workers were recruited directly and payment arrangements included PAYE and approved umbrella companies. These arrangements were supported by established, rigorous due diligence overseen by Finance and Payroll. Finance maintained the approved supplier list; Payroll carried out umbrella checks and provided Key Information Documents. These controls remain part of our ongoing payment and supplier governance.

Supplier standards and review priorities

Our established umbrella due diligence operates alongside the wider supplier standards and review priorities below. Section 10 sets out responsibilities for maintaining controls and progressing wider supplier reviews.

- **Understand the supply chain.** Finance and Compliance will map active suppliers, their services, relevant locations and material subcontracting. Greater attention will be given to labour intensive services, complex payment arrangements and suppliers whose sourcing or working practices create higher risks.
- **Check before approval and renewal.** We will seek appropriate information about ownership, recruitment practices, worker protections and previous concerns. Suppliers will be asked for their modern slavery statement where legally required, or suitable policies and assurances proportionate to their size and risk. Credible adverse information will be assessed and unresolved material concerns escalated before approval.
- **Set clear expectations.** Relevant subcontractor agreements must include anti-slavery and human trafficking provisions before contract performance. Our wider programme will incorporate appropriate terms into new and renewed supplier agreements, addressing freely chosen work, lawful pay, transparent deductions, no recruitment fees, no document retention, prompt reporting and equivalent subcontractor standards.
- **Verify and review.** Continue our established umbrella due diligence and maintain the evidence supporting approval decisions. Wider supplier reviews will use proportionate evidence and follow up. Higher risk relationships will receive additional scrutiny, with access to records or audits sought where appropriate. Worker feedback, pay concerns and material changes must trigger review and escalation where needed.
- **Act when concerns arise.** We will record findings, require corrective actions with owners and timescales, and assess whether they protect affected people. We will seek suitable specialist support and remedy where needed. Relationships may be restricted, suspended or ended where necessary, with the person's safety considered throughout.

Approval is not a permanent assurance that exploitation cannot occur. Finance and Compliance will retain the evidence supporting decisions and bring significant unresolved risks to the board. Smaller suppliers will be given clear explanations of the standards expected and proportionate opportunities to improve.

7. Recruitment, due diligence and training

Recruitment checks cover identity and right to work, employment history and references, qualifications and professional registration, criminal records, occupational health and training, as relevant to the role and applicable requirements. Required checks must be complete before deployment.

Checks must be supported by direct, respectful communication with the worker. A shared address, language difference, disability or family support is not, by itself, evidence of exploitation.

Modern slavery is mandatory training for internal staff and healthcare workers and forms part of onboarding and induction. Completion on time was 100% at 14 October 2026. Compliance monitors role, contractual and course renewal requirements.

Staff must recognise indicators such as unexplained fees or debt, another person speaking for the worker, control of documents or bank accounts, withheld pay, threats, isolation and fear of raising concerns. A warning sign calls for sensitive enquiry and escalation; it is not, by itself, proof of exploitation.

8. Raising concerns and safeguarding

Primary contact: Priya Lad, Registered Manager

priya.lad@homecare-providers.co.uk

Alternative contact: Scott Lane

scott.lane@daywebster.com

Anyone may raise a concern verbally or in writing, including internal staff, healthcare workers, suppliers and people affected by our services. Use the alternative contact if the primary contact is unavailable or involved in the concern. Anonymous concerns will also be considered, although anonymity may limit investigation and feedback.

- **Protect immediate safety.** Call 999 if someone is in immediate danger. Do not confront a suspected exploiter or take steps that could place a person at greater risk.
- **Listen and record.** Speak privately where safe, explain the limits of confidentiality, preserve relevant information and report promptly. Do not promise absolute secrecy or require proof before accepting a concern.
- **Escalate and support.** The reporting lead must assess safeguarding needs and involve the relevant local authority safeguarding service, police or other appropriate authority. Where specialist modern slavery support is needed, seek advice about an authorised first responder and referral options.
- **Respond and learn.** Record the concern, decisions, referrals and outcome. Address unsafe work or supplier arrangements, seek appropriate remedy for harm and check for retaliation. Any decision to suspend or end a relationship must consider the affected person's safety.

For care delivered at home, use the adult or child safeguarding pathway for the person's location. Consider communication needs, access to independent support and the risk posed by anyone controlling contact with the person. The out of hours service supports urgent operational escalation.

A person may contact the police or the relevant safeguarding authority directly without first using our internal process. Information will be shared only where appropriate for safeguarding, investigation or legal obligations.

9. Governance, reporting and accountability

The board oversees implementation across our business and supply chains, supported by Compliance, Finance, Payroll and operational managers. Protecting people and maintaining effective controls are continuing responsibilities.

Reporting, investigation and remedy

Discovery or suspicion of slavery, trafficking, forced or child labour, involuntary prison labour or labour rights abuses must be escalated promptly. Compliance coordinates reporting to relevant law enforcement and safeguarding authorities, the Modern Slavery Helpline, and clients, commissioners or contracting authorities where required. Proof is not required before escalation. Protect immediate safety and follow section 8.

Modern Slavery Helpline: 08000 121 700
www.modernslaveryhelpline.org/report

We will respond promptly to enquiries, cooperate with investigations and provide access to records and audits as required. Corrective action must protect affected people, address the cause, identify an owner and verify the outcome. We will follow applicable rectification processes and seek appropriate remedy for exploited workers, including where recruitment fees are identified.

Oversight and evidence

Area	Responsibility and standard
Annual statement and review	The board and Compliance oversee the annual statement, approval, director signature and publication. They provide annual reports and compliance certifications to relevant contracting parties where required.
Supplier records	Finance, Payroll and Compliance maintain supplier and umbrella approval records. Wider supplier mapping must record names, registered details, functions and operating locations. Records must be available for authorised review.
Risk assessment and actions	Compliance coordinates risk reviews, relevant assessments and action tracking. Assessment tools, independent audits and worker engagement are used where appropriate to risk or required by contract.
Subcontractor standards	Contract owners must maintain due diligence and anti slavery contract provisions. Retain reasonable enquiries about slavery or trafficking convictions involving relevant personnel and verify the basis of company declarations before certification.

Proportionate scrutiny and contractual duties

Higher risk relationships require closer scrutiny of recruitment, fees and worker protections. Where appropriate or required, this includes independent audits, permitted unannounced or semi announced inspections, confidential interviews in workers' own languages and additional training. Findings must inform continued supply and remedy decisions.

Compliance and contract owners must meet applicable notification, evidence, assessment, certification and audit deadlines and performance standards. Serious or unresolved breaches may lead to restrictions, suspension or termination, with affected people's safety considered throughout.

10. Effectiveness and continuous improvement

No suspected modern slavery, recruitment fee, withheld wage or coercion concerns were reported or recorded during the reporting year. We remain alert to hidden risks and encourage workers and others to raise concerns so that they can be addressed promptly.

Training completion at 14 October 2026: 100%. All internal staff and healthcare workers required to complete modern slavery training had done so within the required timescales. Training forms part of onboarding and induction.

Compliance monitors training completion, supplier review coverage, onboarding checks, concerns and outcomes, and timely corrective actions. Records must identify the population covered, completion and due dates, and reporting period, with counts and denominators supporting each percentage.

Priority and owner	Action	Timing and evidence
Recruitment checks Compliance / Recruitment	Add confidential questions about fees paid for work, document retention and control of pay, with safe escalation.	Within 30 days of approval; retain completed checks and escalation records.
Supplier management Finance / Payroll / Compliance	Maintain established umbrella due diligence and approval controls. Progress the wider supplier risk review and prioritised follow up.	Umbrella controls: ongoing. Wider supplier review: within 60 days of approval. Retain checks, decisions and actions.
Training and reporting Compliance / HR / Registered Manager	Maintain timely training and renewals, including onboarding and induction. Promote reporting contacts and protection from retaliation.	Ongoing; retain completion dates, due dates and reporting communications.
Management review Board / Compliance	Review the measures above, findings and overdue actions. Record zero concerns where applicable. Review exploitation indicators in care assessments and welfare contacts.	First review within 90 days of approval, then at least annually and following a significant concern.

The next annual statement will report results and further action. A low number of reports alone is not proof of success. The improvement timetable does not postpone contractual requirements.

Board approval and director signature

This policy and annual statement has been approved by the Board of Directors of **Home Care Providers Limited**. Board approval was confirmed on **14 October 2026**.



Scott Lane
Executive Director, signed for and on behalf of the Board
14 October 2026