

Modern Slavery and Human Trafficking Policy Statement

Company Information

Here4You Care Ltd

Company Number: 15587616

Registered Office Address: 128 City Road, London, United Kingdom, EC1V 2NX

Date of Policy: September 1, 2025

Review Date: September 1, 2026

Introduction

Here4You Care Ltd is committed to upholding the highest standards of ethical conduct and human rights in all aspects of our operations. As a provider of care services, we recognise the vulnerabilities that may exist within the care sector, particularly for migrant workers and those in domestic or supportive roles. Although we are not classified as a commercial organisation under the threshold requirements of the Modern Slavery Act 2015 (specifically Section 54, which applies to organisations with a total turnover of £36 million or more), we voluntarily adopt this policy to demonstrate our dedication to preventing modern slavery and human trafficking. This policy aligns with the principles of the Modern Slavery Act 2015 and serves as our slavery and human trafficking statement.

Definition of Modern Slavery

Modern slavery encompasses a range of severe human rights violations and forms of exploitation where individuals are coerced into working or living under exploitative conditions against their will. It involves coercion, control, abuse, threats, violence, deception, or manipulation. Key characteristics include:

- **Lack of consent:** Individuals are forced, deceived, or coerced into exploitation.
- **Control and ownership:** Perpetrators exert control over victims, treating them as property.
- **Exploitation:** Victims are used for economic or personal gain through labour or services.
- **Restriction of freedom:** Victims are denied the ability to make choices about their lives.

Contributing factors include poverty and inequality, conflict and displacement, weak rule of law, and demand for cheap labour. Common types of modern slavery relevant to our sector include:

- **Human trafficking:** Recruitment, transportation, or harbouring of individuals through force, fraud, or coercion for exploitation, such as labour or sexual trafficking.
- **Forced labour:** Compelling individuals to work under threat of punishment, often in agriculture, construction, domestic work, or care services.
- **Debt bondage:** Forcing individuals to work to repay inflated debts.
- **Domestic servitude:** Exploitation of workers in private homes, involving long hours, low or no pay, isolation, and control.
- **Sexual exploitation:** Coercion into sexual activities for others' benefit.
- **Child slavery:** Exploitation of children through labour, trafficking, or forced begging.
- **Criminal exploitation:** Forcing individuals into illegal activities, such as drug trafficking or theft.

In the care sector, vulnerabilities may arise from restrictive immigration policies, debt bondage among migrant workers, or exploitation in domestic settings.

Our Commitment

Here4You Care Ltd has a zero-tolerance approach to modern slavery and human trafficking in our operations, supply chains, and partnerships. We are dedicated to:

- Ensuring that no form of modern slavery occurs within our business or supply chains.
- Conducting due diligence to identify and mitigate risks.
- Providing training and support to our staff to recognise and report potential instances.
- Collaborating with stakeholders, including suppliers, regulators, and law enforcement, to combat modern slavery.
- Supporting victims through appropriate referrals and safeguards.

This commitment extends to all employees, contractors, suppliers, and partners associated with our organisation.

Scope

This policy applies to all aspects of Here4You Care Ltd's activities, including:

- **Our own operations:** Recruitment, employment practices, and service delivery in care provision.
- **Supply chains:** Procurement of goods and services, such as medical supplies, equipment, and agency staff.
- **Partnerships:** Collaborations with external providers, local authorities, and healthcare organisations.

As a care provider, our primary focus is on ethical recruitment and fair treatment of staff, many of whom may be vulnerable due to migration status or economic circumstances.

Responsibilities

- **Senior Management:** The Registered Manager, Terwase Richard Agwa, is responsible for overseeing the implementation of this policy, ensuring compliance, and approving annual reviews.
- **All Staff:** Employees must adhere to this policy, report suspicions of modern slavery, and participate in training.
- **Human Resources:** Conduct thorough checks during recruitment, including right-to-work verification and background screening, to prevent exploitation.
- **Procurement Team:** Assess suppliers for modern slavery risks and include anti-slavery clauses in contracts.

Risk Assessment and Due Diligence

We conduct regular risk assessments to identify potential areas of modern slavery within our operations and supply chains. This includes:

- Mapping our supply chains to understand suppliers and subcontractors.
- Evaluating high-risk areas, such as reliance on agency workers or international recruitment.
- Requiring suppliers to confirm their compliance with the Modern Slavery Act 2015 and provide their own statements where applicable.
- Performing audits and on-site visits where risks are identified.
- Terminating relationships with suppliers who fail to meet our ethical standards.

In the past financial year, we have taken steps such as reviewing recruitment agencies and incorporating anti-slavery requirements into contracts. No instances of modern slavery were identified, but we continue to monitor and manage risks.

Training and Awareness

All staff receive training on modern slavery as part of induction and annual refresher programs. This covers:

- Recognising signs of exploitation, such as restricted movement, poor living conditions, or fear of authorities.
- Reporting procedures.
- Our ethical policies and the broader context of human rights in the care sector.

Training effectiveness is measured through assessments and feedback.

Reporting Mechanisms

If modern slavery is suspected, reports should be made immediately without confronting suspects, to avoid risks. Internal reporting can be directed to the Registered Manager. External options include:

- Modern Slavery Helpline: 0800 0121 700 (24/7, confidential, anonymous).
- Emergency: Call 999 if there is immediate danger.
- Non-emergency: Call 101.

We encourage compassionate support for potential victims, including referral to the National Referral Mechanism (NRM) for identification and assistance.

Monitoring and Review

This policy will be reviewed annually or following significant changes in legislation or operations. Progress will be measured against key performance indicators, such as training completion rates and supplier compliance audits.

Approval

This policy has been approved by the board and signed by the Director.

Signed: *Agwa Terwase*

Terwase Richard Agwa

Position: Director

Date: September 1, 2025

Modern Slavery Policy

Introduction

Here4you Care Ltd (Company number 15587616) is a private limited company registered in England and Wales, with its registered office at 128 City Road, London, United Kingdom, EC1V 2NX. As a provider of residential care services for the elderly and disabled, we are committed to delivering high-quality, compassionate care while upholding the highest ethical standards. Although we are a small organisation and do not meet the turnover threshold requiring a mandatory slavery and human trafficking statement under section 54 of the Modern Slavery Act 2015, we voluntarily adopt this policy to demonstrate our zero-tolerance approach to modern slavery in all its forms.

This policy outlines our commitment to preventing modern slavery within our operations, supply chains, and business relationships. It applies to all employees, contractors, suppliers, and partners associated with Here4you Care Ltd. The Registered Manager, Terwase Richard AGWA, is responsible for overseeing the implementation and review of this policy.

Definition of Modern Slavery

Modern slavery is a severe violation of human rights involving exploitation where individuals are forced to work or live in coercive conditions against their will. It encompasses slavery, servitude, forced or compulsory labour, and human trafficking. Key characteristics include lack of consent, control and ownership over victims, exploitation for gain, and restriction of freedom.

Forms of modern slavery relevant to the care sector may include:

- Human trafficking for labour or sexual exploitation.
- Forced labour, such as in domestic servitude or through deceptive recruitment practices.
- Debt bondage, where workers are trapped by inflated debts.
- Child slavery or exploitation.
- Forced marriage or criminal exploitation.

We recognise that vulnerabilities in the care sector, such as reliance on migrant workers and supply chains for equipment and services, can increase risks. Factors contributing to modern slavery include poverty, inequality, conflict, weak rule of law, and demand for cheap labour.

Our Organisational Structure and Supply Chains

Here4you Care Ltd operates as a small care provider focused on residential services for the elderly and disabled. Our structure includes a Registered Manager, care staff, administrative personnel, and support roles. We employ a limited number of staff and engage with suppliers for goods and services such as medical equipment, cleaning supplies, food, and agency staffing.

Our supply chains are primarily UK-based and include local suppliers for everyday operations. We conduct due diligence on all suppliers to ensure they align with our ethical standards. As a non-commercial organisation in the sense of low turnover, our risks are assessed as low, but we remain vigilant, particularly regarding recruitment agencies and international workers.

Policies in Relation to Modern Slavery

We maintain policies that support our commitment to preventing modern slavery:

- **Recruitment Policy:** Includes rigorous right-to-work checks, identity verification, and background screening to prevent exploitation.
- **Whistleblowing Policy:** Encourages confidential reporting of concerns, including suspected modern slavery, without fear of reprisal.
- **Safeguarding Policy:** Treats modern slavery as a form of abuse, with procedures for identification and response, aligned with UK legislation.
- **Supplier Code of Conduct:** Requires all suppliers to comply with the Modern Slavery Act 2015, including anti-slavery clauses in contracts.
- **Training Policy:** Mandates awareness training for staff on recognising and reporting modern slavery.

These policies are reviewed annually or as needed to ensure compliance with best practices.

Due Diligence Processes

We implement due diligence to identify and mitigate modern slavery risks:

- **Supplier Assessment:** New suppliers complete a questionnaire confirming their anti-slavery measures. High-risk suppliers (e.g., recruitment agencies) undergo enhanced checks.
- **Risk Mapping:** We assess operations and supply chains for risks, focusing on migrant labour and vulnerable groups in the care sector.
- **Contractual Obligations:** All contracts include clauses allowing audits and termination for non-compliance with anti-slavery laws.
- **Remediation:** If modern slavery is identified, we commit to immediate action, including reporting to authorities and supporting victims through the National Referral Mechanism (NRM).

Risk Assessment and Management

Risks are assessed annually, considering factors like poverty, migration, and sector-specific vulnerabilities (e.g., care worker shortages leading to exploitative practices). We manage risks through:

- Regular audits of payroll and working conditions.
- Collaboration with local authorities and NGOs.
- Monitoring indicators such as unusual debt arrangements or restricted worker freedoms.

Training and Awareness

All staff receive mandatory training on modern slavery upon induction and annually thereafter. Training covers recognition of signs (e.g., isolation, poor living conditions), reporting procedures, and sector-specific risks. We partner with organisations like the Modern Slavery Helpline for resources and updates.

Reporting Mechanisms

Suspected modern slavery should be reported immediately to the Registered Manager or via the Modern Slavery Helpline (0800 0121 700). In emergencies, contact 999; for non-emergencies, 101. Reports are handled confidentially, with support provided to victims, including access to shelter, legal aid, and psychological services through the NRM.

Monitoring, Review, and Effectiveness

This policy is reviewed annually by the Registered Manager to assess effectiveness, using key performance indicators such as training completion rates, supplier compliance audits, and incident reports. We measure success by zero instances of modern slavery and continuous improvement in awareness.

Approved by:

Terwase Richard AGWA

Registered Manager

Date: [Insert Date]