

## The Modern Slavery Act 2015 – Policy

### Modern Slavery Policy

1. ONE CARE SOLUTION is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. One Care Solution is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. One Care Solution Ltd provides appropriate training and awareness information for all its staff.  
In particular:
  - Our Demoiselle Chidzuu, Managing Director receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
  - Our Managing Director undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
  - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to contact Demoiselle Chidzuu, Managing Director, 0191 8163526.
5. Reports surrounding these issues are taken extremely seriously by Managing Director Demoiselle Chidzuu, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
  - Working with the appropriate organisations to improve standards,
  - Removing that organisation from our preferred supplier list,
  - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
  - The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
  - The percentage of workers supplied from audited businesses / our preferred supplier list,
  - The effectiveness of enforcement against suppliers who breach policies,

- The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
  - The level of modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
8. We would also recommend reading this in conjunction with our other policies, including our:
- Corporate social responsibility policy,
  - Ethical procurement policy,
  - Anti-bribery / corruption policy, and
  - Whistle-blowing policy.

This policy was adopted on 05/10/2023 after being agreed by Managing Director and Management team. It is reviewed annually.

This statement is made as part of ONE CARE SOLUTION commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how ONE CARE SOLUTION operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act and relates to the financial year January 2023 to January 2024 It was approved by on 05/10/2023.

## **Our Business**

One Care Solution operating in the recruitment sector. We provide temporary staff in the Private Hospital, Nursing homes, NHS and Council

One Care Solution Ltd is a private Limited Company.

### **1.1 Who we work with**

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff.

The hiring companies that we work with are located at 166 High Street East, Wallsend, NE28 7RP. The worker we supply live in Northeast.

## **2 Our Policies**

One Care Solution Ltd has a modern slavery policy.

In addition, One Care Solution Ltd has the following policies which incorporate ethical standards for our staff and suppliers.

## **2.1 Policy development and review**

One Care Solution Ltd policies are established by Managing Director based on advice from HR professionals, industry best practice and legal advice. We review our policies annually, or as needed to adapt to changes.

## **3 Our Processes for Managing Risk**

To assess the risk of modern slavery, we use the following processes with our suppliers: When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistleblowing.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

After due consideration, we have identified the following potential risks in our supply chain:

- Africa, Europe and Asia
- Healthcare

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.
- We work with Policy and local council to combat the risk of modern slavery and human trafficking.

Our staff are encouraged to bring any concerns they have to the attention of management.

## **4 Our Performance**

As part of monitoring the performance of One Care Solution, we track the following general key performance indicators:

- Cash in hand and working back-to-back shifts.

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by Managing Director

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements.
- the percentage of worker supplied from audited businesses / our preferred supplier list.
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We Benchmark our indicator against industry best practice, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

## **5 Our Training**

All of our staff receive training and support that is appropriate to their role. In particular:

- Our HR Department undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.

As part of this, our staff are encouraged to discuss any concerns that they have.

Training is refreshed annually.

## Notes

| Note no. | Issue                                   | Explanation   |
|----------|---|---|
| 1.       | Financial year                          | Only businesses which meet the relevant criteria (see section 3 of this guide) are required by law to publish a statement. Where required, the statement must be published for each financial year in the organisation.   |
| 2.       | Approval                                | The statement should be approved by: <ul style="list-style-type: none"> <li>the board of directors, for a limited company, or</li> <li>the members, for a limited liability partnership.</li> </ul>   |
| 3.       | Signature and title                     | The statement should be signed by: <ul style="list-style-type: none"> <li>a director, for a limited company,</li> <li>a designated member, for a limited liability partnership,</li> <li>a general partner, for partnerships formed under the Limited Partnerships Act 1907, or</li> <li>a partner, for any other partnership.</li> </ul>   |
| 4.       | Business – individual / group structure | Group structure is important because the parent/subsidiary structure is used to determine which organisations are <i>obliged</i> to produce a modern slavery statement.   |
| 5.       | Business – who we work with             | The aim of this section is to provide some transparency around your business, your operating model, and your supply chains. It is <i>not</i> necessary to go into financial details (such as the income generated in particular sectors or regions), although some organisations may provide this detail.   |
| 6.       | Business – other relationships          | <a href="#">Home Office guidance</a> in this area suggests including any groups that represent workers and labour standards, such as trade unions / professional bodies.  |
| 7.       | Policies                                | Even if your assessments determine that you have no realistic risks, you may still want to consider having specific policies. In particular, other businesses you work with may expect you to have such policies as part of <i>their</i> due diligence processes around modern slavery.   |
| 8.       | Processes for Managing Risk             | These processes will differ greatly between organisations. It is understood that the level of due diligence you can engage in will not be the same at all organisations. For example: <ul style="list-style-type: none"> <li>If you are a vendor in a multi-tier supply chain, it will generally be significantly easier for you to engage with any first-tier suppliers you use (because you have direct contractual and personal relationships), and it may be</li> </ul> |

| Note no. | Issue  | Explanation  |
|----------|--|--|
|          |  | <p>more difficult to engage with suppliers further down the chain,</p> <ul style="list-style-type: none"> <li>• If you are a relatively small business in comparison to an organisation you work with, you may have very limited commercial leverage in order to encourage that organisation to act with greater transparency or improve standards, and</li> </ul> <p>Even with extensive audits and spot-checks, some businesses will go to great lengths to obscure any evidence of human trafficking, forced labour, bonded labour etc.</p>   |
| 9.       | Processes for Managing Risk – potential risks  | <p><a href="#">Home Office guidance</a> gives four example categories that you may want to discuss if they apply to you:</p> <ul style="list-style-type: none"> <li>• Country risks, in particular if you source workers from countries where working practices may be very different, such as if workers are unable to retain their own ID (e.g. passport, visas) or other paperwork, or where there are human rights concerns,</li> <li>• Sector risks, because there may be substantially different working practices between different sectors,</li> <li>• Transaction risks, where payments may be made in opaque or unusual fashions with associated risk regarding money laundering, and</li> <li>• Business partnership risks, acknowledging that different relationships your business has may have different risks associated with them. This can involve a variety of factors including knowledge and familiarity with the other business's working practices, the length of the relationship, and any due diligence (audits etc.) you have conducted.</li> </ul> |
| 10.      | Processes for Managing Risk – minimising risks | <p>You should discuss the steps you have taken to minimise these risks. If you have previously encountered issues with modern slavery or worker exploitation and remedied them, it would be appropriate to provide examples.</p> <p>This does not mean that you must automatically cut off relationships with any companies/countries/sectors where you have identified the potential for risks. It can be appropriate to maintain relationships but work with businesses to improve standards and transparency.</p> <p>This does not have to be restricted to activity that is internal to your business. For example, you might also be participating in wider programmes run by a third-party, such as a professional body, NGO or charity.</p>   |

| Note no. | Issue                      | Explanation   |
|----------|----------------------------|---|
| 11.      | Performance                | <p>You should consider which of your existing key performance indicators (KPIs) can be used as part of tracking any potential modern slavery risks.</p> <p>You should also consider whether you have established (or should establish) any specific KPIs relating to modern slavery. For example, you might be tracking:</p> <ul style="list-style-type: none"> <li>• The level of training amongst your staff,</li> <li>• The speed with which you investigate related complaints, and the effectiveness of any whistle-blowing procedures, and/or</li> <li>• The level of compliance and transparency you have established in your supply chain.</li> </ul>   |
| 12.      | Performance – benchmarking | <p>You should consider whether any KPIs may have unintended consequences – for example:</p> <ul style="list-style-type: none"> <li>• A target intended to improve standards – such as minimising the number of serious breaches of your company’s policies – might unintentionally discourage staff from reporting concerns, or</li> <li>• If you operate as a neutral or master vendor, an unrealistic standard for speed of supply, guaranteed supply, and/or low margins with the businesses below you in the supply chain may unintentionally lead to those companies cutting corners and, as a consequence, increasing the risk of issues. For example, in the GLA regulated sector, the <a href="#">GLA maintains guidance on indicative minimum charge rates</a> below which it is uneconomic to supply a worker without impacting on statutory rights or obligations. The linked guidance is from March 2016, but the GLA publishes new briefing documents periodically.</li> </ul> |
| 13.      | Training                   | <p>You should consider providing opportunities for staff to discuss the training with an appropriate colleague(s), in particular if they have any questions or concerns that they want to raise.</p> <p>For many businesses, it will often be appropriate for staff to receive online or pre-recorded training, or documents/emails to raise awareness; however, you may want to signpost them to appropriate colleagues or other contacts to discuss the issues raised.</p>  |