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MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Policy Reference: PE07

Version: 2026

Review Date: April 2027

Approved By: Board of Directors

Organisation: De Vere Care Partnership Ltd

Registered Office:

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Southend Road

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1. POLICY STATEMENT

De Vere Care Partnership Ltd is committed to conducting all aspects of its business in an ethical, lawful and responsible manner.

We have a zero-tolerance approach towards modern slavery, forced labour, servitude, debt bondage, human trafficking and any form of exploitation.

We recognise our responsibility to protect the human rights of all individuals who work for us, use our services, supply goods or services to our organisation, or come into contact with our business activities.

We are committed to ensuring that modern slavery and human trafficking do not occur within our organisation or within any part of our supply chain.

This policy reflects our commitment to acting with honesty, integrity, fairness and transparency in all our business dealings and relationships.

2. ABOUT DE VERE CARE PARTNERSHIP LTD

De Vere Care Partnership Ltd is a Care Quality Commission (CQC) regulated provider of domiciliary care and support services.

The organisation provides care and support services to hundreds of adults across Essex and Greater London and employs more than 500 members of staff.

Our services include:

- Personal Care
- Reablement Services
- Dementia Care
- Learning Disability Support
- Physical Disability Support
- Hospital Discharge Services
- Community-Based Care and Support

As a large employer operating within the health and social care sector, we recognise the importance of ensuring that every person connected with our organisation is treated with dignity, fairness and respect.

3. OUR COMMITMENT

De Vere Care Partnership Ltd is committed to:

- Preventing modern slavery and human trafficking in all forms.
- Promoting equality, diversity and inclusion.
- Providing fair and lawful employment practices.
- Ensuring all workers are treated with dignity and respect.
- Paying staff in accordance with all legal requirements.
- Carrying out robust recruitment and employment checks.
- Working only with reputable suppliers and contractors.
- Encouraging individuals to raise concerns without fear of retaliation.
- Taking immediate action where concerns are identified.

We expect the same standards from all suppliers, contractors, agency providers, consultants and business partners.

4. WHAT IS MODERN SLAVERY?

Modern slavery is a serious crime and a violation of fundamental human rights.

It can take many forms including:

- Human trafficking.
- Forced labour.
- Debt bondage.
- Slavery.
- Servitude.
- Child labour.
- Exploitation through threats, coercion or abuse.

A person may be a victim of modern slavery if they are forced to work against their will, have restrictions placed on their freedom, are exploited financially, physically or emotionally, or are unable to leave their employment situation.

Modern slavery can occur in any industry and in any country, including the United Kingdom.

5. LEGAL RESPONSIBILITIES

This policy supports compliance with:

- Modern Slavery Act 2015.
- Human Rights Act 1998.
- Care Act 2014.
- Employment Rights Act 1996.
- Equality Act 2010.
- Health and Safety at Work Act 1974.
- Relevant safeguarding legislation and guidance.

All employees are required to comply with this policy.

6. RECRUITMENT AND EMPLOYMENT PRACTICES

De Vere Care Partnership Ltd operates robust recruitment procedures designed to prevent exploitation and unlawful employment.

These include:

- Verification of identity.
- Right to work checks.

- Verification of qualifications where required.
- Employment reference checks.
- Disclosure and Barring Service (DBS) checks.
- Sponsorship compliance checks where applicable.
- Ongoing employment monitoring.

All employees receive written terms and conditions of employment and are free to leave their employment in accordance with their contractual arrangements.

The organisation does not tolerate any practice that may restrict an individual's freedom of movement or employment rights.

7. SPONSORSHIP AND MIGRANT WORKERS

The organisation employs a number of workers who require immigration permission to work in the United Kingdom.

We recognise that sponsored workers can sometimes be at increased risk of exploitation.

To minimise this risk, De Vere Care Partnership Ltd:

- Complies fully with Home Office sponsor licence requirements.
- Provides clear employment contracts.
- Ensures staff understand their rights.
- Pays staff fairly and lawfully.
- Provides access to HR support and management guidance.
- Encourages staff to raise concerns confidentially.

All sponsored workers are treated equally and fairly and are afforded the same rights and protections as all other employees.

8. SUPPLY CHAIN MANAGEMENT

We recognise that modern slavery risks may exist within supply chains.

Our supply chains include:

- Recruitment agencies.
- Training providers.
- IT suppliers.
- Office suppliers.
- Utility providers.
- Facilities management contractors.
- Vehicle suppliers.
- Waste management providers.

To minimise risks we:

- Carry out supplier due diligence.
- Assess supplier suitability before engagement.
- Work with reputable organisations.
- Include ethical expectations within contractual arrangements where appropriate.
- Review supplier performance regularly.

Any supplier found to be involved in modern slavery or human trafficking may have their contract terminated immediately.

9. SAFEGUARDING AND IDENTIFICATION OF CONCERNS

All employees have a responsibility to remain alert to indicators of modern slavery.

Possible signs may include:

- Individuals appearing fearful or withdrawn.
- Evidence of physical abuse.
- Lack of personal identification documents.
- Restricted freedom of movement.
- Unusual working arrangements.
- Financial control by another person.
- Poor living conditions.
- Fear of speaking openly.

Where concerns are identified, employees must report them immediately using the organisation's safeguarding or whistleblowing procedures.

All concerns will be investigated appropriately and reported to relevant authorities where necessary.

10. WHISTLEBLOWING

De Vere Care Partnership Ltd encourages all employees, service users, family members, suppliers and members of the public to report concerns regarding suspected modern slavery.

Reports can be made through:

- Line management.
- Senior management.
- Human Resources.

- Safeguarding leads.
- Whistleblowing procedures.

Individuals raising concerns in good faith will be protected from victimisation, discrimination or any detrimental treatment.

Anonymous concerns will also be investigated wherever possible.

11. TRAINING AND AWARENESS

The organisation provides ongoing training and awareness to ensure employees understand:

- What modern slavery is.
- How to recognise potential indicators.
- Their safeguarding responsibilities.
- Reporting procedures.
- Whistleblowing arrangements.

Training is reinforced through induction programmes, supervision, team meetings and policy updates.

12. MONITORING AND REVIEW

De Vere Care Partnership Ltd regularly reviews the effectiveness of its approach to preventing modern slavery through:

- Internal audits.
- Recruitment audits.
- Sponsorship compliance reviews.
- Safeguarding audits.

- Supplier reviews.
- Whistleblowing monitoring.
- Policy reviews.

Any lessons learned will be incorporated into future improvements.

13. RESPONSIBILITY FOR THIS POLICY

Overall responsibility for this policy rests with the Board of Directors.

Senior Managers are responsible for ensuring effective implementation throughout the organisation.

All employees, agency workers, contractors and volunteers are responsible for complying with this policy and supporting the organisation's commitment to preventing modern slavery and human trafficking.

14. APPROVAL

This Modern Slavery and Human Trafficking Policy has been approved by the Board of Directors of De Vere Care Partnership Ltd.

Signed: Neelesh Kumar

Neelesh Kumar

Managing Director

De Vere Care Partnership Ltd



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