

## Modern Slavery Policy

### CQC Fundamental Standards

| Legislation                    | Details                                                                                 |
|--------------------------------|-----------------------------------------------------------------------------------------|
| Regulation 17: Good governance | Systems or processes must be established and operated effectively to ensure compliance. |

### Key Lines of Enquiry

| KLOE       | How this applies to Access to Modern Slavery                                                        |
|------------|-----------------------------------------------------------------------------------------------------|
| Safe       | By supporting fundamental human rights we support the safety of all people.                         |
| Well - Led | Maintaining the records necessary to avoid modern slavery as part of being a well-led organisation. |

This policy should be read in conjunction with our:

- Code of Conduct For Workers Policy
- Duty of Candour Policy
- Whistleblowing Policy

### Policy Statement

#### Policy Aims

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain.

The aim of this policy is to help our staff to understand what constitutes Modern Slavery, what the various responsibilities within the company are, and how we plan to tackle the issue of Modern Slavery within our workplace.

### What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

## EXAMPLES OF MODERN SLAVERY

An example of Modern Slavery would be if somebody is being paid below the National Minimum Wage, forced into working more than 48 hours a week, or being denied the required amount of break time and rest between shifts, which goes against the Working Time Derivative

### Service Users

As a care service, we ensure no vulnerable adult in our care is subject to any conditions that meet the Care Act (and similar) definitions of modern slavery. If Micrah Healthcare has any suspicions, information or evidence that any of its service users 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.

### Working Time Derivative:

The 48-hour week is defined as an average over a 17 week period. So, a 50-hour week followed by a 5 hour week would not be in breach of legislation.

Care workers are also able to opt-out of the working time derivative and, if doing so, a copy must be kept in their personnel file.

### Due Diligence Processes

Micrah Healthcare undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Micrah Healthcare's due diligence process includes building long-standing relationships with suppliers, making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance.

To ensure all those in our supply chain and contractors comply with our values, we have in place a standard clause in all our new agreements with suppliers and contractors which informs them of our commitment to combatting slavery and human trafficking and requires them to agree to this commitment when working with us.

We are committed as a company to tackling modern slavery and human trafficking and want to work with suppliers who share this commitment.

### Compliance with the Policy

You must ensure that you read, understand, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistle blowing Policy as soon as possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

## Key Question: Will I receive any training on Modern Slavery?

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation and our supply chains, we intend to develop a training and information campaign to help staff to better understand the risks and how we as an organisation are working to manage this. All our staff have been provided with a copy of this policy, which encourages individuals to monitor and report anything untoward. We also encourage our business partners to provide training to their staff and suppliers

## Who is Responsible for this Policy?

\_\_\_\_\_ has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it

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\_\_\_\_\_ has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

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Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

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## Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- continuous monitoring of our business and its supply chains to ensure we are free from slavery and human trafficking;
- continuing to require our contractors and supply chains to act in accordance with our Anti-Slavery policy when dealing with us; and
- ongoing education and promotion of our Anti-Slavery Policy along with a training program to ensure our staff understand and adopt our values.

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015

## Monitoring and Review

The Company Secretary will check this policy is working properly and they will review it at least once a year. We will make improvements to the policy wherever we can.

Employees are invited to suggest any ways the policy can be improved.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

## Key Points to Take Away

- We must conduct our business in an open and ethical way, avoiding any breach of Modern Slavery Law, both in-house and through our suppliers. This is the law and our own standard.
- Micrah Healthcare undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.
- You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015.

## After reading this Policy, you should be able to:

- Understand what Modern Slavery Policy is and how the Modern Slavery Policy operates;
- Understand how Modern Slavery Policy operates at Micrah Healthcare and have an awareness of the actions we take in preventing, identifying and reporting concerns;
- Understand the role you play in Modern Slavery Policy.

If you have not understood any of these points, please ask your Line Manager or trainer for further help.

## Policy Review

A Director will review this policy at least once a year to make any updates needed.

## Authorisation and Signature

This Policy is the authorised version agreed by the Directors of Micrah Healthcare.

All employees are expected to follow this policy and failure to do so could result in disciplinary action.



Director's Signature

Adetutu Adeyinka

Director

