

## Modern Slavery & Anti-Trafficking Policy

### 1. Policy Statement

Evercare Recruitment Limited is fully committed to the prevention of modern slavery, human trafficking, forced labour, and all forms of exploitation within our business operations and supply chains. We uphold the principles of transparency, fairness, and ethical recruitment practices across all recruitment activities—domestic and international.

This policy outlines the measures we take to identify, prevent, and respond to any risks of modern slavery within our workforce, supply chain, and partner organisations.

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### 2. Scope

This policy applies to:

- All employees, agency workers, and contractors engaged by Evercare Recruitment Limited.
- All clients, umbrella companies, supply chain partners, and international recruitment intermediaries.
- All countries and sectors in which we operate, including healthcare, social care, and domiciliary care placements.

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### 3. Legal & Regulatory Framework

We comply with the following key legislation and guidance:

- **Modern Slavery Act 2015**
- **Employment Agencies Act 1973**
- **Conduct of Employment Agencies and Employment Businesses Regulations 2003**
- **Gangmasters and Labour Abuse Authority (GLAA) licensing principles**
- **International Labour Organisation (ILO) Conventions**
- UK Visas and Immigration (UKVI) sponsor licence compliance (if applicable)

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### 4. Definitions

- **Modern Slavery:** Encompasses slavery, servitude, forced or compulsory labour, and human trafficking.
- **Human Trafficking:** The recruitment, transportation, or harbouring of persons by means of coercion, abduction, or deception for exploitation.
- **Exploitation:** Includes forced work, debt bondage, abuse of vulnerability, and withholding of wages or documents.

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### 5. Organisational Commitments

Evercare Recruitment Limited commits to the following:

- **Zero tolerance** for any form of modern slavery or human trafficking.
- Rigorous **vetting of all suppliers, umbrella companies, and overseas partners.**
- Ensuring all workers are recruited **freely and without coercion**, with no fees charged to workers for employment.

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- Providing all candidates with **written contracts**, clear wage information, and rights documentation before placement.
- Regular **risk assessments** of supply chains and third-party recruitment agencies, particularly those based overseas.

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### 6. Due Diligence and Supply Chain Compliance

We conduct due diligence by:

- Requiring all umbrella companies and suppliers to sign a **Modern Slavery Declaration**.
- Auditing our supply chain partners (including international recruitment agencies) for compliance.
- Verifying that no workers have been recruited through **forced, bonded, or illegal means**.
- Prohibiting partners from withholding passports, charging illegal recruitment fees, or making unlawful deductions.
- Conducting **site visits and compliance spot checks** where appropriate.

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### 7. Identification and Reporting of Concerns

#### 7.1 Signs of Modern Slavery

Staff and managers are trained to recognise signs such as:

- Unexplained injuries or signs of abuse
- Workers being fearful or withdrawn
- Limited freedom of movement
- Unusual control over personal documents or finances
- Excessive working hours or living in poor conditions

#### 7.2 Reporting Process

Any concerns must be reported immediately via:

- **Internal whistleblowing mechanism** (confidential reporting to the Registered Manager or Director)
- **External authorities** such as the **Modern Slavery Helpline** (0800 0121 700), GLAA, or the police

All concerns are treated seriously and investigated thoroughly, with protection for whistleblowers in line with the **Public Interest Disclosure Act 1998**.

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### 8. Training and Awareness

- All staff receive **annual training** on identifying and responding to modern slavery.
- Additional training is provided to recruitment and compliance staff responsible for vetting and onboarding.
- Workers receive an **information leaflet** on their rights, pay, and how to report abuse or exploitation.

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### 9. Ethical Recruitment Standards

We adhere to the following standards:

- **No recruitment fees charged** to candidates (in line with WHO Code of Practice).
- **Transparent contracts** issued to all staff in a language they understand.
- Overseas workers must be **recruited ethically**, with the right to leave employment freely.
- Recruitment partners must not use **coercion, threats, or deception** in their practices.

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### 10. Governance and Accountability

Role	Responsibility
Directors	Oversee implementation and effectiveness of the policy
Compliance Manager	Perform audits, risk assessments, and investigate concerns
Recruitment Consultants	Ensure ethical engagement of all workers and report risks
All Staff	Complete training and report any signs of exploitation

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### 11. Monitoring and Review

- This policy is reviewed **annually** or in response to legislative updates or incidents.
- Key performance indicators (KPIs) may include:
  - Number of modern slavery training completions
  - Risk rating of third-party suppliers
  - Number of reported incidents and outcomes

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### 12. Public Transparency

- Evercare Recruitment Limited will publish a **Modern Slavery Statement** annually (where required by turnover thresholds) on our website.
- The statement will outline actions taken to identify, assess, and mitigate modern slavery risks.

Approved By:  
Name: Talha Abdul Patel

Signed: 

Date: 15/07/2025