

Severn Angels Healthcare Ltd

Modern Slavery and Human Trafficking Policy Statement

(In accordance with the Modern Slavery Act 2015)

1. Introduction

At Severn Angels Healthcare Ltd, we are committed to upholding the highest standards of ethical conduct and human rights across all aspects of our business. We recognise our legal and moral responsibility to take a robust and proactive approach to preventing slavery, servitude, forced or compulsory labour, and human trafficking within our operations and supply chains.

As a healthcare recruitment agency operating across the UK, our business model involves the recruitment, placement, and support of healthcare professionals, including nurses, carers, support workers, and allied health professionals, into temporary and permanent positions. Due to the nature of our services and the vulnerable sectors we serve, we acknowledge the heightened risks of modern slavery and exploitation, and we have embedded comprehensive safeguarding mechanisms to mitigate and respond to these risks.

2. Our Commitment

We are fully committed to:

- Operating transparently, ethically, and in compliance with the Modern Slavery Act 2015.
- Ensuring that modern slavery and human trafficking have no place in our business, in the recruitment and placement of workers, or in our supply chains.
- Promoting dignity, fairness, equality, and respect for all individuals involved in our operations and wider networks.

This policy statement outlines the steps we are taking to assess and address modern slavery risks and our zero-tolerance approach to such practices.

3. Definitions

Modern slavery encompasses a range of exploitative practices, including:

- Human trafficking – the recruitment, movement, or harbouring of people through force, coercion, deception, or abuse of vulnerability for the purpose of exploitation.
- Forced labour – when a person is forced to work under threat or coercion.

- Debt bondage – when a person is forced to work to repay a debt, with no control over their terms of employment.
- Servitude and slavery – where people are dehumanised, treated as property, or deprived of their freedom.

4. Internal Practices and Safeguards

To safeguard against modern slavery, we have implemented the following measures:

- **Rigorous Recruitment Processes:** All candidates undergo a robust recruitment and compliance process, including identity checks, right-to-work verification, reference checks, and disclosure (DBS) checks. We also conduct candidate interviews to verify that individuals understand their employment terms and have freely consented to their placements.
- **Training and Awareness:** All internal staff receive mandatory training on identifying and reporting signs of modern slavery and labour exploitation. We promote awareness of the indicators of trafficking and coercion, especially for those responsible for onboarding, compliance, and worker liaison.
- **Fair Employment:** All agency workers and employees are issued contracts that comply with UK employment law. We ensure that pay rates meet or exceed the National Minimum Wage and that working hours, holidays, and breaks are properly administered. We do not withhold passports, and workers are free to leave their assignments with appropriate notice.
- **Whistleblowing and Reporting:** We have a whistleblowing policy in place, and all concerns raised by staff, agency workers, or third parties are taken seriously and investigated. Concerns related to exploitation or trafficking can be reported in confidence to our Safeguarding Officer or through our designated whistleblowing channels.
- **Continuous Review:** Our safeguarding and compliance policies are reviewed annually and updated in response to changes in legislation, best practices, and organisational learning.

5. Supply Chain and Third-Party Expectations

We expect all of our suppliers, contractors, umbrella companies, and business partners to:

- Comply with the Modern Slavery Act 2015 and relevant international labour standards.
- Operate ethically, transparently, and with due regard for human rights.
- Implement policies and due diligence procedures to identify and eliminate modern slavery and labour exploitation in their own operations and supply chains.
- Sign and adhere to our Supplier Code of Conduct, which explicitly prohibits forced labour, child labour, and trafficking.

Failure to comply with these requirements may result in the termination of our relationship with the supplier or partner.

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6. Risk Assessment and Mitigation

We regularly assess the risk of modern slavery in our business activities, especially in:

- Overseas recruitment partnerships and high-volume supply chains.
- Sectors and roles where workers may be at increased risk of vulnerability or isolation.
- Temporary staffing arrangements where third parties are involved.

Mitigation measures include contract audits, worker feedback mechanisms, and cross-checks with national anti-slavery databases and enforcement agencies.

7. Support and Reporting

Individuals who suspect or witness instances of modern slavery or exploitation in our operations or supply chain are encouraged to report this via the following confidential channels:

- Email (General concerns): info@severnangels.co.uk
- Email (Staff concerns): manager@severnangel.co.uk
- Anonymous Reporting Line: text to: 07453440197
- Safeguarding Lead Contact: simbarashe@severnangels.co.uk

We will take all reports seriously and handle them sensitively and with full confidentiality. Where necessary, we will report incidents to the appropriate authorities including the police, the Gangmasters and Labour Abuse Authority (GLAA), or the local safeguarding board.

8. Oversight and Review

This policy is reviewed and approved by the Board of Directors annually. Updates are made as required to reflect legal, organisational, or contextual changes. The Board is ultimately responsible for ensuring that modern slavery is prevented and that Severn Angels Healthcare remains compliant with all relevant legislation and ethical standards.

Approved by:

Name: Spiwe Mhondiwa

Position: Director, Severn Angels Healthcare Ltd

Signature:



Date: **01/05/2025**