



March 2024

MODERN SLAVERY POLICY

Date written:	01/03/2024
Author(s):	Sarah Anderson
Version(s):	4.0
Date signed off:	31/03/2024
Review by:	Date – 01/03/2026

Careaid Limited

Lock Studios
7 Corsican Square
London, E3 3YD
Telephone: 02034172630, 02038134690
Out of hours: 07739643780
E-mail: info@careaid.co.uk
Web: www.careaid.co.uk

MODERN SLAVERY POLICY

Organisation's Structure, Business and Supply Chain

Careaid Limited is not a non-relevant commercial organisation as our turnover is less than £36million. We are headquartered in Bow House Business Centre, Room 106b, 153-159 Bow Road, London and deliver various services, including home care, domiciliary care and supported living services. We have care homes and services in multiple locations, including Hackney and LB of Barking (CONFIRM), and we ensure that we work with local supply chains to procure essential resources. This approach ensures that we reduce the risk of modern slavery and human trafficking in our supply chain. Our organisational structure is as follows:

- Registered Manager – Abu Zafar Mohammed Mahfouz
- Training Manager: Florenda Quilty
- Compliance Manager: Sara Anderson
- Care Coordinator: Chidinma Chukwuani
- HR Manager: Alisha Ali
- Office Manager: Tanvirul Alam

Modern Slavery & Human Trafficking Policy

At Careaid, we are committed to ensuring a work environment that is free from modern slavery, forced labour and human trafficking. Additionally, we also promote ethical supply chain practices, ensuring that we will not tolerate slavery, servitude, forced or compulsory labour in the manufacture of products we use or sell and will not accept products or services from suppliers who employ or utilise slavery, servitude, forced or compulsory labour in any manner. We have developed a Modern Slavery and Human Trafficking Policy to guide our efforts to ensure that these do not exist within our operations and supply chain. Mr. Abu Zafar Mohammed is responsible for overseeing the practice and ensuring our policy is updated based on the change in legislation. He ensures our policy is in compliance with the following:

- The Modern Slavery Act 2015
- Health and Safety at Work etc. Act 1974
- Human Rights Act 1998
- The Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012

To minimise the chance of employing a person who has been, or is subject to, slavery or human trafficking, we will conduct rigorous background verification during the recruitment process. This includes a DBS check, identity check, confirmation of validity to work in the UK, employment history, suitability for the role and references.

Due Diligence of Modern Slavery and Human Trafficking

As a responsible organisation, the relevant local or national government policies must be also implemented throughout our supply chain. Prior to commencing work with a supplier, we will ensure they are sufficiently vetted and qualified to complete the work required and hold their Modern Slavery policies and procedures to ensure these values are mirrored throughout our service. We will ask the suppliers to complete a pre-qualification

questionnaire, which asks questions related to procedures and processes in their organisation to mitigate the risk of modern slavery and human trafficking. Once the collaboration has been established, it is also important to ensure the consistency of their practices. We will conduct regular reviews and audits of our supply chain, ensuring their procedures are adhering to best practice standards.

Assessing and Managing Risk of Slavery in the Supply Chain

We recognise that we are working in a sector where the risk of modern slavery and human trafficking can be significant, particularly within the supply chain. We source multiple resources to deliver various support services, including staff uniforms, PPE kits, packaged food, and vegetables. Although we significantly collaborate with local supply chains, it is still imperative to ensure they have clear procedures for preventing modern slavery and human trafficking. In sectors like manufacturing, construction and agriculture, modern slavery is prevalent, and we follow rigorous procedures to assess and manage the risk of slavery in the supply chain. This includes:

- We have designated our Registered Manager, Abu Zafar Mohammed, to ensure our business partners and supply chain comply with relevant regulations, including the Safeguarding Policy and Modern Slavery and Human Trafficking Policy.
- Prior to reaching an agreement, we will conduct thorough due diligence on suppliers we would potentially work with. During the initial screening process, a pre-qualification questionnaire will be shared, which suppliers must complete. We will assess their labour policy, labour rights, and any policies related to the prevention of child labour and modern slavery statements.
- Comprehensive risk assessments will be conducted to identify any risk related to sourcing from potential suppliers. Potential risks may include the nature of work, forced labour, financial transparency, and recruitment practices.
- We will collaborate with non-governmental organisations and industry-specific groups to launch initiatives and stay informed about emerging risks and best practices in combating modern slavery within the supply chain.

Monitoring Effectiveness

Before contract commencement, Our Registered Manager Abu Zafar Mohammed will establish project Key Performance Indicators (KPIs) to monitor the effectiveness of our performance in preventing modern slavery and human trafficking in our business and supply chain. This includes:

- Spot checks and site visits to assess the suppliers' compliance with relevant regulations, including safeguarding and prevention of modern slavery and human trafficking.
- Analysing supplier certification, audit documents and company policies.
- Analysing the risks identified and mitigation strategies adopted.
- Creating action plans to address risk to modern slavery.
- Providing training to managers on modern slavery.

Staff Training

All staff will undergo rigorous training on our Modern Slavery and Human Trafficking Policy and Safeguarding Policy. These will be delivered during their induction and annual refresher training by our Training Manager, Florenda Quilty. This will ensure:

- They are aware of the indicators of modern slavery and human trafficking, such as forced labour, where the person is coerced into work, through threat of violence or other means, as a form of penalty or without any compensation.
- Understand the ILO definition of child labour, where children under 12 are completely prohibited from any work and children between 12-14 are not permitted from more than light work.
- They are able to identify if anyone they come into contact with is at risk, or is suspected of, being a victim of modern slavery and human trafficking.
- Able to escalate matters of modern slavery and human trafficking to either the Care Coordinator or the Registered Manager
- Inform the police on 999 if an individual is at immediate risk of danger or harm.