

Modern Slavery Act 2015 and Ethical Employment Policy

This policy has been published with accordance with the Modern Slavery Act 2015 s54 and sets Q Care's commitment and steps taken to prevent modern slavery (including forced labor, human trafficking, debt bondage) and human trafficking within our business, its operations and supply chains. This policy is implemented across all aspects of our service, including recruitment, employment practices and interactions with contractors and suppliers.

Introduction

Q Care Limited has branch offices throughout Wales which provides domiciliary care and are committed to ensuring that slavery and human trafficking are not taking place in any part of our organisation and its supply chains.

Q Care has a zero tolerance approach to slavery, servitude, forced labour and human trafficking (modern slavery), and is committed to conducting business with honesty, integrity and treating everyone with dignity and respect. Our existing policies, processes and contracts show that we embrace the principles and aims of:

- Safeguarding policies and processes
- The Welsh Government's Code of Practice in Ethical Employment in Supply Chains.
- The Modern Slavery Act 2015

Anti-Slavery and Ethical Employment Champion.

We have appointed our Responsible Individual, Operations Manager and Human Resources Director as our Ethical Employment Champions and have developed an action plan to meet the commitments in the Code. The Senior Management Team reviews the progress of this action plan and policy annually.

Policies on modern slavery/ethical employment

We have a robust governance structure which oversees the development and implementation of policies that discuss our commitment to tackling modern slavery; of which are reviewed annually. These include Gifts Policy, Whistleblowing policies, Safeguarding Policies and Procedures.

Due Diligence

We implement robust due diligence processes to identify and mitigate the risk of modern slavery and ethical employment within our business operations and supply chains.

Risk Assessment/Review

We conduct regular risk assessments/reviews to identify and mitigate the risk of modern slavery within our business operations and supply chains.

Employee awareness and training and reporting mechanisms

We provide advice and guidance to relevant staff and those teams who have direct responsibility for relevant supply chains, plus our 'customer facing' teams who regularly enter homes to ensure a high level of understanding of the risks of modern slavery. For example, we provide essential safeguarding guidance which covers how to spot the signs and indicators of modern slavery.

The training also gives guidance on what to do if they suspect it is happening. We endeavour to ensure that individuals reporting concerns are protected from any form of retaliation.

Ethical Employment/responsibilities in Supply Chains

We engage with suppliers and contractors in a way that promotes ethical sourcing and encourages them to have their own anti-slavery policies in place.

We have developed this Ethical Employment Policy which sets out how we comply with the principles of the Ethical Trading Initiative Base Code:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

In meeting these principles, we take the following actions:

Employment

We employ staff directly or where the business needs require through our own Recruitment Methods. Where necessary we will pay agency fees but we endeavour to keep their use and these payments to a minimum. In procuring the use of a recruitment or employment agency we will ensure that their practices are compliant by asking them to sign to the code.

With the exception of work experience and apprenticeships we pay our employees the National Living/Minimum Wage. We will also encourage our supply chain to comply and will consider their stance on this when we make procurement decisions.

We respect our employee's right to join a trade union and do not operate Blacklisting and will not tolerate this in our supply chain.

Procurement

We take a value for money approach to procurement and will consider whether the terms being offered are only being made possible due to unethical employment or business practices. We will review the use of subcontractors, non-standard specifications, payment terms and delivery deadlines when making procurement decisions. Where we feel that the supplier is not complying with the spirit of this policy or is using unfair terms we will not commit to them.

Our direct supply chain is UK based however products and some services may be procured globally. We will carry out appropriate due diligence checks where we believe there is a risk that this policy is being compromised. If these checks confirm a breach of this policy, we will take the necessary action to either rectify the issue or terminate the relationship at the next opportunity.

We are developing a Sustainable Procurement Strategy to assist in the implementation of these actions and to better meet a variety of expectations and requirements in respect of procurement decisions.

Reporting, Safeguarding and Escalation

Q Care encourages its employees and suppliers (where permitted by law) to report certain matters confidentially or anonymously without fear of retaliation, including circumstances that may give rise to slavery or human trafficking concerns.

We have robust safeguarding processes in place and have trained our staff on their responsibilities and role in reporting potential issues regarding the safeguarding and protection of vulnerable people.

We have a system in place for reporting concerns or breaches and for escalating these issues (particularly in respect of corruption, fraud and safety issues) internally or to external regulatory or statutory agencies. Our escalation processes have been reviewed and we are working to ensure that all staff are aware of their rights and protections in respect of escalation of issues of concern.

We have a publicly available complaints process for external parties to raise issues of concern.

We work with Local Authorities, encourage our staff to report suspicions to the police, engage with CIW.

Further support and advice may be obtained from:

- **Modern Slavery Helpline**

The UK Government also provides a 24-hour modern slavery helpline that victims, employers and members of the public who may encounter modern slavery can call for expert support and advice. Telephone **0800 0121 700**

- **England and Wales**

The Salvation Army **0300 303 8151**

- **Women's Aid**

028 9024 9041 (for female potential victims of human trafficking)

- **Unseen www.unseenuk.org**

Unseen is a UK charity with its head office in Bristol. We provide safehouses and support in the community for survivors of trafficking and modern slavery. We also run the UK Modern Slavery & Exploitation Helpline and work with individuals, communities, business, governments, other charities and statutory agencies to stamp out slavery for good.

Monitor and Review

This policy will be monitored and reviewed annually by the appointed persons to ensure its effectiveness to ensure that it remains up-to-date and relevant.