



Modern Slavery Statement

This statement is made as part of Instant Healthcare UK Ltd.'s commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act), to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year to 31 October 2019.

Instant Healthcare UK Ltd recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

1. Our business

Instant Healthcare UK Ltd is a limited company operating in the employment sector. Our business consists of employment across the health and social care sectors, education and animal health. We supply temporary and permanent workers.

Instant Healthcare UK Ltd is an independent business.

1.1. Who we work with?

All of the permanent work-seekers we provide are known to and identified by our staff. All of the temporary workers we supply are also identified by our staff. Some of these work-seekers operate through their own limited companies.

The hiring companies that we work with are located in various locations across the UK, Guernsey, Jersey, Isle of Man. The workers we supply live in locations local to the clients we are working with or advise the travel is not a concern and acceptable.

2. Our policies

Instant Healthcare UK Ltd has a modern slavery policy.

In addition, Instant Healthcare UK Ltd has the following policies which incorporate ethical standards for our staff and our suppliers.

- **Whistleblowing policy.** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct.** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating nationally, internationally and managing its supply chain.
- **Supplier code of conduct.** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

2.1 Policy development and review

Instant Healthcare UK Ltd.'s policies are established by our directors and senior management team based on advice from HR professionals, industry best practice and legal advice. We review our policies annually or as needed to adapt to changes.

3. Our processes for managing risk

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

When engaging with suppliers, where available, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing. When engaging with any candidate they need to pass our own pre-employment checks with verified right to work documentation, identification and qualifications.

- We conduct paper audits before entering into a commercial relationship with any business where there is the potential for risk.
- We review the potential for risk at regular intervals.
- After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our workforce or businesses we supply to. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses or staff we supply us, in order to investigate any complaints.
- We require the businesses we work with to abide by our code of supplier conduct, address modern slavery concerns in their policies.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships.
- Our staff are encouraged to bring any concerns they have to the attention of senior management.

4. Our training

All of our staff receive training and support that is appropriate to their role. In particular:

- Our recruiters, HR professionals, senior management team and staff involved in our procurement and supply chains undertake training that include guidance around modern slavery and human trafficking, as well as other wider human rights issues

The organisations modern slavery training covers:

- Our business's negotiating practices, which influence supply chain staffing and which should therefore prevent the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and government guidelines.
- What steps the organisation should take if its business partners do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Training is reviewed annually.

As well as initial training staff, the organisation will raise awareness of modern slavery issues by circulating a series of emails to staff.