Freshney Pelham Care Ltd

Modern Slavery Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that FPC has taken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern day slavery is the recruitment, movement, harbouring or receiving of women, children or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

FPC has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically, and with integrity and transparency in business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

The Modern Slavery Act 2015 is designed to consolidate various offences relating to human trafficking and slavery. The provisions in the act create a requirement for an annual statement to be prepared that demonstrates transparency in supply chains. In line with all businesses with a turnover greater than £36 million per annum, the NHS is also obliged to comply with the Act.

The aim of this statement is to demonstrate that FPC follows good practice and all reasonable steps are taken to prevent slavery and human trafficking.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking.

About the organisation

Whilst FPC is outside of scope of the £36 million threshold financial turnover, we fully support the Government's objectives to eradicate modern slavery and human trafficking and we recognise the significant role the NHS has to play in both combatting it, and supporting victims.

We work in partnership with other providers from both health and social care, helping people to maintain independent lifestyles in their own homes for as long as they can.

In accordance with the Modern Slavery Act 2015, FPC, makes the following statement regarding the steps it has taken to ensure that Modern Slavery i.e. slavery and human trafficking, is not taking place in any part of its supply chains.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Recruitment policy** - We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, to safeguard against human trafficking or individuals being forced to work against their will.
- **Equal Opportunities** - We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair

pay rates, fair terms and conditions of employment, and access to training and development opportunities.

- **Safeguarding policies** - We adhere to the principles inherent within both our safeguarding children and adults policies. These are compliant with the NELC multiagency agreements and provide clear guidance so that our employees are clear on how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.
- **Freedom to Speak Up** - We work within the FTSU framework, and ensure that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.

Training and advice

Training and advice about modern slavery and human trafficking is available to staff through the safeguarding training programme and via the Safeguarding Lead Nurse. We work with the health and social care system to ensure we are raising awareness of modern slavery and developing a high level of understanding regarding the risks relating to modern slavery and human trafficking.

Supply Chain

We take all appropriate steps to ensure that Modern Slavery and Human Trafficking is not taking place in any part of FPC business or supply chains including;

- Requiring all companies (with a turnover of over £36 million), provide an annual Slavery and Human Trafficking statement / report to comply with the Modern Slavery Act, 2015.
- Building long standing relationships with our suppliers and make clear our expectations of business behaviour. Where national or international supply chains are used, we expect those suppliers to have suitable anti-slavery and human trafficking policies and procedures and where there is a risk of Slavery and Human Trafficking taking place, steps have been taken to assess and manage that risk.

Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Date of Statement 16th April 2025