

MODERN SLAVERY POLICY

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Policy Number	ACG/Group/C&L33
Version Number	01
Purpose	This policy: <ul style="list-style-type: none"> Sets out the steps that Active Care Group will take to ensure modern slavery is not taking place within our business or supply chains.
Scope	This policy applies to: <ul style="list-style-type: none"> All colleagues across the Active Care Group. Sites and services in England, Scotland and Wales.
Policy Owner	Karen Langton, Chief People Officer
Policy Ratified	Karen Langton, Chief People Officer on 05/06/2025
Policy Signed Off	Kevin Monteith, Group Director of Risk, Governance and Safety on 13/06/2025
Date Issued	16/06/2025
Date for Review	15/06/2026
Electronic Location (EL)	Intranet/Sharepoint and Echo
Associated Policies	ACG Safeguarding Policies C&L09 Freedom to Speak Up Policy
Associated Standard Operating Procedures (SOPs)	



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1 INTRODUCTION

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
- 1.2 Active Care Group (ACG) has a zero-tolerance approach to modern slavery and human trafficking, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

2 DEFINITIONS

- 2.1 Modern Slavery is a serious and often hidden crime in which people are exploited for criminal gain. The impact can be devastating for the victims.
- 2.2 The common factors are that a victim is, or is intended to be, used, or exploited for someone else's (usually financial) gain without respect for their human rights under four broad categories of labour exploitation, domestic servitude, sexual exploitation, and criminal exploitation.
- 2.3 For adult victims there will be some element of coercion involved such as threats, use of force, deception, or abuse of power.
- 2.4 Victims may appear to give consent but in reality they have little ability to choose to leave the situation.
- 2.5 Child victims and vulnerable adults are not able to give informed consent and therefore exploitation even without any element of coercion could constitute modern slavery.

3 RESPONSIBILITIES

- 3.1 ACG's Executive Board have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under their control comply with it.
- 3.2 ACG's zero tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the outset of any business relationship and reinforced as appropriate thereafter.
- 3.3 We do not enter business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

4 REPORTING MODERN SLAVERY

- 4.1 Where a colleague suspects a case of modern slavery, this should be reported to their line manager or follow C&L09 Freedom to Speak Up Policy. Additionally, it should be reported by one of the following methods:
- Phoning 999 if there is an immediate risk of harm.
 - Reporting to the police by calling 101 if there is no immediate risk of harm.
- 4.2 We aim to encourage openness and will support anyone who raises a genuine concern in good faith, even if they turn out to be mistaken.

5 BREACHES OF THE POLICY

- 5.1 Colleagues should be aware that if they are found to be operating under the definition of the Modern Slavery Act, they will be subject to disciplinary action which could result in their dismissal.
- 5.2 ACG may terminate our relationship with other individuals or organisations working on its behalf if we believe a breach has occurred.

6 COMMUNICATION & AWARENESS

- 6.1 In accordance with Section 54 of the Modern Slavery Act 2015, ACG will develop and post on the company’s website an annual Modern Slavery Statement setting out the steps taken to ensure modern slavery is not taking place in our business and/or our supply chains.

7 EQUALITY IMPACT STATEMENT

- 7.1 This policy has been equality impact assessed, and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any employee or applicant, and it helps to promote equality in our services.

8 LEGISLATION

- 8.1 Modern Slavery Act 2015

9 ASSOCIATED DOCUMENTS

- 9.1 Modern Slavery Statement

10 DOCUMENT VERSION HISTORY

Version	Description of Revision	Date of Revision
01	New Groupwide policy – was previously HR14	16/06/2025

Modern Slavery Statement for Financial Year 2025/2026

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Active Care Group (ACG) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chains.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. ACG has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all 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 chains.

Our Policies

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

1. **Modern Slavery Policy** - This policy sets out the organisation's stance on modern slavery and explains how colleagues can identify any instances of this and where they can go for help.
2. **Safer Recruitment Policy** - We operate robust recruitment procedures, including conducting eligibility to work in the UK checks (prior to employment commencing and during employment when a re-check is required), for all colleagues to safeguard against human trafficking or individuals being forced to work against their will.
3. **Disciplinary Policy** - We are committed to creating a culture and work environment, which is free from bullying, harassment, and victimisation, where everyone is treated with the utmost dignity and respect. ACG will not tolerate bullying, harassment or victimisation of any kind. Any behaviour that undermines this aim is totally unacceptable and will be dealt with via our Disciplinary Policy.
4. **Equality, Diversity, and Inclusion Policy** - We are committed to ensuring equality of opportunity for all colleagues irrespective of age, disability, sex, gender reassignment, sexual orientation, race, religion or belief, marital status and civil partnerships and aims to ensure all that all managers, colleagues and contractors are made fully aware of the behaviour that is and is not acceptable within the business.
5. **Freedom to speak Up Policy** - We operate a robust policy and confidential hotline to ensure all colleagues know that they can raise concerns confidentially about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
6. **Anti-Bribery and Anti-Corruption Policy** - This policy exists to set out the responsibilities of ACG and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for our business it helps them recognise and deal with bribery and corruption issues and understand their responsibilities.
7. **Conduct Policy** - This policy is intended to guide colleagues on the required standards of conduct within ACG. It outlines the professional conduct expected of all colleagues.

Our Suppliers

ACG operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes requesting to see their policy in relation to modern slavery as part of the tender process. Our Modern Slavery Policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, during new tenders we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.

Reviews

We hold regular management meetings and reviews. We regularly check the internet for any bad news in relation to our suppliers, both during the tender process and for current suppliers.

Our 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 colleagues, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.



Keith Browner
Chief Executive Office