

## Anti-Slavery Policy



### Document Control

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Policy Manager:	Samantha Woosnam	Review Date: Aug 2026

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Version No:	Purpose / Change	Author(s)	Date
1	New Policy, New information.	LW/SW	August 2023

## Anti-Slavery Statement

Coverage Care is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

Our recruitment and people management policies are constructed to make certain that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

## Aims and Objectives

The aims of the Anti-Slavery Policy are to reflect Coverage Care's commitment to combatting slavery and human trafficking and to acting with integrity in all its dealings, relationships, and supply chains. The policy outlines how Coverage Care's various procurement and HR practices, policies and procedures ensure compliance with its policy commitment.

Coverage Care commits to raising and maintaining awareness of modern slavery and human trafficking and to apply proper due diligence and risk assessment processes in its dealings with staff and suppliers. It expects the same high standards from all its staff, suppliers, contractors, and those with whom it does business.

The policy objective is to ensure that Coverage Care directors and staff act with integrity in all company dealings, relationships and supply chains.

## Roles and responsibilities

It is the responsibility of the Executive Management Team (EMT) to ensure that policies and procedures in place for the recruitment and management of all staff and volunteers are in accordance with relevant legislation and to monitor and review such policies and their effectiveness.

It is the responsibility of the home managers to understand and for ensuring that those reporting to them understand and comply with this policy.

It is the responsibility of the hiring manager to ensure that staff recruited have the required identity checks performed to minimise the risk of modern slavery and human trafficking in our organisation.

It is the responsibility of HR to support the hiring managers in the delivery of their recruitment strategy. Those involved in the recruitment process may seek guidance from HR at any time.

It is the responsibility of all staff who are responsible for sourcing suppliers of goods or services to ensure that the provisions of the Modern Slavery Act 2015 are complied with in the supply chain.

### **Recruitment and Selection**

Coverage Care has policies and procedures in place to ensure compliance with UK employment law. We carry out periodic internal audit reviews to provide assurance on the operation of these. Our HR team effectively support recruitment activities with hiring managers. We carry out appropriate background checks including Right to Work and Disclosure and Barring Service checks for all appointments. Linked Policies include:

- Safe Recruitment Policy
- Equal Opportunities Policy
- Safeguarding Policy
- Right to Work in the UK Policy
- Whistleblowing Policy
- Dignity at Work Policy

We will continue to review our policies to ensure that they are effective and appropriate.

### **Procurement**

Coverage Care acknowledges there is a risk that a supply chain may involve the use of a hidden or unknown subcontractor reliant on forced labour. We consider this risk to be low due to the nature of our business and nature of our supply chains, we take our responsibility seriously.

To manage this risk, we work with suppliers and contractors to acknowledge our commitment to combat slavery by inserting relevant clauses into our contracts and agreements wherever practicable. Appropriate due diligence is carried out when engaging with suppliers of goods and / or services and risk assessments undertaken when appropriate to do so.

### **Reporting Concerns**

Coverage Care encourages staff to raise any concerns about modern slavery, using its whistleblowing policy if necessary, and will support anyone who acts in good faith.

Coverage Care Services Ltd did not receive any reports of instances of modern slavery or human trafficking in the financial year ending 05 April 2023.

### **Review and update**

The HR Department will be responsible for reviewing this policy every three years or where changes to legislation impact on the policy.