SHALOM HEALTH RECRUITMENT LTD

Modern Slavery Policy and Statement

Modern Slavery Policy

1. Introduction and scope

1.1 Shalom Health Recruitment Ltd (SHR) is a CQC registered provider of health and social care services for vulnerable young people and adults in their own homes, in the community and in supported living environments. Operated by nurses and serving areas of London, Devon, Wiltshire, Dorset, Hampshire and Wales, we work with Local Authorities, Integrated Care Boards and private clients to provide person-centred care to people who may have mental health needs, learning disabilities, autism and other complex health and social care needs.

1.2 This document is both SHR's Modern Slavery Policy and our Modern Slavery Statement for the financial year ending 31 May 2026. It is made in line with section 54 of the Modern Slavery Act 2015 and the Home Office statutory guidance, Transparency in Supply Chains: A Practical Guide (updated 25 March 2025), and it covers the six areas that guidance recommends.

1.3 SHR's annual turnover is below the £36 million threshold at which section 54 makes a statement mandatory. We publish this statement voluntarily, as the Home Office guidance encourages, because we work with vulnerable people and public sector commissioners and believe transparency is the right standard.

1.4 You must read and comply with this policy if you work for, or on behalf of, SHR in any capacity, including as an employee, director, officer, agency or bank worker, consultant, volunteer, recruitment partner, supplier or service provider.

1.5 Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and SHR. It may also lead to other legal action, including referral to the police or other enforcement bodies.

1.6 If you are an employee, this policy does not form part of your contract of employment, and we may amend it at any time.

2. What we mean by modern slavery

2.1 Modern slavery is a serious crime that deprives people of their liberty for another person's gain. Under the Modern Slavery Act 2015 it includes:

- **slavery, servitude and forced or compulsory labour** (section 1);
- **human trafficking**, meaning arranging or facilitating a person's travel, including within the UK, with a view to their exploitation (section 2); and
- **exploitation** as defined in section 3, including sexual exploitation, labour exploitation, criminal exploitation, removal of organs, and securing services or benefits from children and vulnerable people by force, threats or deception.

2.2 In health and social care recruitment, warning signs include workers being charged recruitment fees, being in debt to a recruiter or employer (debt bondage), having their passport or identity documents held by someone else, being given a different contract on arrival from the one agreed (contract substitution), unlawful or excessive repayment clauses, several workers sharing one bank account, address or phone number, and workers being controlled, isolated or afraid to speak.

2.3 SHR has a **zero-tolerance approach** to modern slavery and human trafficking. We conduct our business fairly, ethically and with respect for fundamental human rights, and we are committed to effective systems and controls to prevent modern slavery in our own business and in our supply chains.

3. Legislation and guidance we comply with

3.1 This policy and statement reflect the following UK legislation and guidance, as in force at the date of this statement:

- **Modern Slavery Act 2015**, including the offences in sections 1 to 4 and the transparency in supply chains duty in section 54.
- **Home Office statutory guidance, Transparency in Supply Chains (updated March 2025)**, which sets out recommended content across six areas, expects statements to improve year on year, and recommends Board approval, signature by a director and publication within six months of the financial year end.
- **Nationality and Borders Act 2022 (Part 5)**, which governs the identification of, and support for, victims through the National Referral Mechanism (NRM).
- **Procurement Act 2023** (in force from 24 February 2025), under which modern slavery offences are mandatory exclusion grounds and labour market misconduct is a discretionary ground in public procurement, with a central debarment list; and **Procurement Policy Note 009: Tackling Modern Slavery in Government Supply Chains (April 2025)**.
- **Employment Rights Act 2025**, which established the **Fair Work Agency**. Since April 2026 the Fair Work Agency has taken over the enforcement work previously carried out by the Employment Agency Standards Inspectorate and the Gangmasters and Labour Abuse Authority, including labour exploitation investigations.
- **Employment Agencies Act 1973** and the **Conduct of Employment Agencies and Employment Businesses Regulations 2003**, which prohibit charging work-seekers fees for finding them work.
- **Code of Practice for the International Recruitment of Health and Social Care Personnel in England (Department of Health and Social Care, updated March 2025)**, including no fees for candidates, no active recruitment from red list countries, amber list countries only under government-to-government agreements, the NHS Employers Ethical Recruiters List, and fair, transparent and tapering repayment clauses.
- **Immigration Rules and Home Office sponsor guidance**, including the closure of the Health and Care Worker route to overseas applicants for care worker roles from 22 July 2025, with in-country switching permitted until 22 July 2028, and sponsors' duties not to pass prohibited sponsorship costs on to workers.
- **Care Act 2014** and the **Health and Social Care Act 2008 (Regulated Activities) Regulations 2014**, including Regulation 13 (safeguarding service users from abuse) and Regulation 19 (fit and proper persons employed).
- **Children Acts 1989 and 2004** and **Working Together to Safeguard Children 2023**, including child sexual and criminal exploitation.
- **Public Interest Disclosure Act 1998** (whistleblowing), the **Equality Act 2010**, and the **UK GDPR and Data Protection Act 2018** for handling information about suspected victims.

3.2 **Forthcoming changes.** The Immigration and Asylum Bill, introduced to Parliament on 30 June 2026, proposes to amend section 54 by making the content of statements mandatory, requiring Board approval and a director's declaration of accuracy, requiring statements to be submitted to Government within six months of the financial year end, and introducing civil penalties of up to £1 million or 1% of turnover (whichever is greater) for failing to publish. At the date of this statement the Bill is not yet law. SHR has structured this statement to meet the proposed requirements and will update it when the Bill receives Royal Assent and its regulations are published.

4. Our structure, business and supply chains

4.1 SHR is a private limited company registered in England and Wales and led by its Board of Directors. We directly employ registered nurses, senior carers, care and support workers and office-based staff, who deliver regulated care across the regions listed in paragraph 1.1.

4.2 Our main supply chains are: recruitment services (job boards, recruitment partners and, where used, overseas recruitment partners); temporary staffing from approved agencies; training providers; personal protective equipment (PPE), gloves and care consumables; IT, care management and digital systems; vehicles, fuel and travel; and office, cleaning and facilities services. We do not manufacture goods.

5. Our policies

5.1 This policy sits alongside, and is reflected in, our Safeguarding Adults and Children Policy, Recruitment and Selection (Safer Recruitment) Policy, Whistleblowing Policy, Grievance Policy, Equality and Diversity Policy, Data Protection Policy, Responsible Procurement Policy and Supplier Code of Conduct.

5.2 We give every employee a written contract of employment and pay everyone in accordance with the law, including at least the National Living Wage or National Minimum Wage for all working time, including travel time between calls. We comply with our legal obligations on working hours, rest breaks, holidays, sick pay and health and safety.

5.3 We never charge workers fees for finding them work, never hold workers' passports or identity documents, and pay wages only into a bank account in the worker's own name.

6. Assessing and managing risk

6.1 We assess modern slavery risk at least annually, and whenever we enter a new market, supply category or recruitment channel. The areas we consider highest risk for SHR are:

- **international recruitment and third-party recruiters**, because of the risk of recruitment fees, debt bondage, document retention, contract substitution and unlawful repayment clauses;
- **sponsored workers**, whose immigration status depends on their employer and who may be reluctant to raise concerns;
- **temporary and agency labour** used to cover shifts;
- **low-wage outsourced services**, such as cleaning and maintenance;
- **PPE and medical gloves**, where forced labour has been identified in global manufacturing; and
- **the people we support**, who may themselves be victims of exploitation, such as cuckooing, county lines or financial and labour exploitation.

6.2 For each risk we record the controls in place and the actions needed in our modern slavery risk register, which our Anti-Slavery Officer reviews and reports to the Board.

7. Due diligence in our business and supply chains

Our own recruitment

7.1 We carry out safer recruitment checks on everyone who works for us, including identity and right to work checks, enhanced DBS checks where required, references and checks of professional registration. As part of these checks we look for signs of exploitation, such as workers sharing a bank account, address or phone number, or a third party controlling their documents or communications.

7.2 Where SHR sponsors workers, we meet our sponsor licence duties in full. We do not pass on to workers any costs that the Home Office sponsor guidance prohibits, including the Immigration Skills Charge and the Certificate of Sponsorship fee. Any repayment clause follows the Code of Practice: it is explained in writing before the job offer is accepted, limited to itemised costs we have paid on the worker's behalf, interest-free, tapered over time, and waived where the worker leaves because of mistreatment.

7.3 We only use international recruitment partners that are on the NHS Employers Ethical Recruiters List, comply with the Code of Practice and do not charge candidates fees, and we do not actively recruit from red list countries.

Our suppliers

7.4 Our Responsible Procurement Policy and Supplier Code of Conduct require all direct suppliers, service providers and contractors to answer questions on modern slavery and to commit to preventing it in their own activities and supply chains. We carry out due diligence on potential suppliers before they join our supply chain and continue it through contract management. We maintain a Preferred Supplier List (PSL) so that all recruitment and temporary staffing is carried out through vetted suppliers.

7.5 If you supply us with goods or services, you must assess your business and supply chains and confirm to our Anti-Slavery Officer that you:

- comply with your legal obligations relating to modern slavery, including section 54 of the Modern Slavery Act 2015 where it applies to you;
- are committed to ensuring there is no modern slavery in your business or any of your supply chains;
- do not charge workers recruitment fees and do not retain workers' identity documents; and
- will provide a copy of your anti-slavery policy or modern slavery statement, and allow us to carry out reasonable checks or audits on request.

7.6 If you breach this policy, or modern slavery is found in your business or, to your knowledge, in your supply chain, we may terminate our contract with you and pursue legal remedies. Where it is safe and appropriate, we will first work with you to put things right for the workers affected, including repaying any unlawful fees.

8. Training and awareness

8.1 All staff complete modern slavery awareness training at induction, with refresher training every year. The training covers the indicators of modern slavery in workplaces and in the homes and communities where we provide care, and how to report concerns.

8.2 Managers, recruiters, and staff who handle procurement or onboarding receive additional training on recruitment-related risks, the Code of Practice and supplier due diligence. Our Anti-Slavery Officer keeps up to date with changes in law and guidance.

9. Reporting concerns and responding to them

9.1 You must immediately report any suspicion of modern slavery in our business, our supply chains or the life of anyone we support to our Anti-Slavery Officer. The Anti-Slavery Officer will investigate and report to the directors within a reasonable time on the action needed.

9.2 If someone is in immediate danger, call **999**. Concerns can also be reported to the police on **101**, to the **Modern Slavery and Exploitation Helpline on 08000 121 700**, through the relevant local authority safeguarding team, and, for concerns about agency

or labour exploitation, to the Fair Work Agency. Concerns about a person we support are also handled under our Safeguarding Policy.

9.3 Our response will always put the safety and wishes of the potential victim first. We will not confront a suspected exploiter in a way that could put anyone at risk. Where appropriate we will support a referral into the National Referral Mechanism through a designated first responder, such as the police or local authority. Adults must consent to an NRM referral; children do not need to consent and will always be referred.

9.4 You will not suffer any detrimental treatment for reporting a genuine concern in good faith under this policy, even if it turns out to be mistaken. If you believe you have been treated unfairly for raising a concern, tell our Anti-Slavery Officer immediately and, if you are an employee, use our Grievance and Whistleblowing Policies.

10. Measuring effectiveness

10.1 We use the following indicators to measure how effective our approach is. The Anti-Slavery Officer reports them to the Board each year, and we will publish the results in our next statement:

- percentage of staff who have completed modern slavery training at induction and annual refresher;
- percentage of new starters whose recruitment file confirms right to work, no fees charged, documents held by the worker and wages paid into their own account;
- percentage of recruitment partners and agencies on our PSL who have completed modern slavery due diligence, and, for international partners, are on the Ethical Recruiters List;
- percentage of supplier contracts that include modern slavery clauses;
- number of concerns raised, investigations completed and their outcomes; and
- actions completed from our modern slavery risk register.

11. Programme of continuous improvement

11.1 In the next 12 months SHR will:

- roll out refresher awareness training to all staff and volunteers;
- make sure modern slavery is addressed in all key policies and procedures across the organisation;
- continue to risk-assess suppliers and address the risks identified, starting with recruitment, agency staffing and PPE;
- audit a sample of recruitment files and recruitment partners against the Code of Practice;
- introduce a confidential worker feedback survey that asks about recruitment fees, document retention and working conditions;
- move towards Level 2 (best practice) of the Home Office guidance in each of the six reporting areas; and
- prepare for the reporting changes proposed in the Immigration and Asylum Bill.

12. Roles and responsibilities

12.1 The **Board of Directors** has overall responsibility for this policy, approves this statement each year and receives the Anti-Slavery Officer's report.

12.2 Our **Anti-Slavery Officer (ASO)** is **Kofi Awudi, Director**. The ASO is responsible for this policy, its day-to-day implementation, the risk register, investigations and reporting.

12.3 **Registered Managers and line managers** make sure their teams are trained, check that recruitment and onboarding meet this policy, and escalate concerns. **All staff** must follow this policy and report concerns.

12.4 All employees are required to sign a copy of this policy to confirm they have read and understood it.

13. Approval and review

13.1 This statement has been approved by the Board of Directors of Shalom Health Recruitment Ltd and is signed by a director, who confirms that it is accurate to the best of their knowledge and belief. It will be published on our website, with a link on the homepage, within six months of the end of each financial year.

13.2 We will review this policy and statement every year, and sooner in response to new legislation or guidance, including when the Immigration and Asylum Bill receives Royal Assent.

Name of Authorised Person: Kofi Awudi

Position: Director

Signature: Kofi Awudi

Approved by the Board on: 31.05.2026

Written on: 31.05.2026

Next Review Date: 30.05.2027