

MODERN SLAVERY, CHILD LABOUR & INHUMANE TREATMENT POLICY

Designated Officer:	Yasmin Mandil
Designated Officer Contact details:	020 3773 4144
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1. CareJoy Healthcare is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. CareJoy Healthcare is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. CareJoy Healthcare provides appropriate training and awareness information for all of its staff.

In particular:

All our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to Yasmin Mandil, Head of Compliance.

Reports surrounding these issues are taken extremely seriously by our board of directors, Barry Pactor, CEO & Darren Stubbs, Director, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:

- Working with the appropriate organisations to improve standards,
- Removing that organisation from our preferred supplier list,
- Passing details to appropriate law enforcement bodies.

We regularly monitor our risks in this area using relevant key performance indicators, including:

- The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
- The percentage of candidates supplied from audited businesses / our preferred supplier list,
- The effectiveness of enforcement against suppliers who breach policies,
- The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
- The level of modern slavery training and awareness amongst our staff.

As part of our efforts in this area, we publish a modern slavery statement on an annual basis.

We would also recommend reading this in conjunction with our other policies, including our:

- Corporate social responsibility policy,
- Ethical procurement policy,



- Anti-bribery / corruption policy, and
- Whistle-blowing policy.

This policy was adopted in May 2020 after being agreed by our board of directors. It is reviewed annually.

Modern Slavery Statement

This statement is made as part of CareJoy Healthcare's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how CareJoy Healthcare operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act and relates to the financial year in line with our annual accounts. It was approved by the board of directors in May 2020.

Yasmin Mandil
Head of Compliance

Our Business

CareJoy Healthcare is a limited company operating in the recruitment sector. We supply temporary workers in the healthcare sector working with Nursing and Allied Health Professionals.

CareJoy Healthcare is an independent business.

Other relationships

As part of our business, we also work with the following organisations:

- NHS
- Department for Health
- Local authorities
- Local businesses
- The wider healthcare community
- REC
- APSCo
- NMC
- HCPC

Our Policies

See our full policy manual for a full list of policies.

Policy development and review

CareJoy Healthcare's policies are established by our directors, based on advice from HR professionals, industry best practice and legal advice, and in consultation with the REC. We review our policies on a regular basis, or as needed to adapt to changes.

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, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.

We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list. We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. 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 who supply us, in order to investigate any complaints.

We require the businesses we work with to abide by our code of supplier conduct or provide us their published modern slavery statement.

We collaborate with our suppliers in order to improve standards and transparency across our supply chain.

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 in any area where we have identified the potential for risk.

We ensure that all of our suppliers are members of appropriate industry bodies and working groups. We work with the NMC, HCPC, REC, APSCO, Local Authorities, NHS & Private clients in order to combat the risk of modern slavery and human trafficking.

Our staff are encouraged to bring any concerns they have to the attention of management.

Our Performance

- As a small agency, we have limited obligations under the law, however we check a number of key performance indicators to ensure adherence to all applicable legislations.
- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements
- the percentage of workers supplied from audited businesses / our preferred supplier list
- the effectiveness of enforcement against suppliers who breach policies
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We carefully consider our indicators, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

Our Training

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

All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

As part of this, our staff are encouraged to discuss any concerns that they have. Training is refreshed annually.