



Modern Slavery Policy

Policy Statement

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 ("MST"). It sets out the steps taken by John Hanks Care Ltd, to prevent modern slavery and human trafficking in its business and supply chain.

John Hanks Care Ltd fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role we can play, both contractually and supporting victims. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

We recognise that being in the recruitment industry, we are exposed to risks relating to the potential violation of human rights in areas including modern slavery and human trafficking. We are conscious that such risks can arise in certain areas of the sector, in particular human trafficking and exploitation. We are committed to monitoring such risks in our business and in our wider supply chain and mitigating them.

John Hanks Care Ltd 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 mitigate and against any form of modern slavery violations within the business or our supply chain.

About the organisation

John Hanks Care Ltd is a privately-owned company registered in England and Wales. The Company is carrying on business in the UK as a care provider specialising in dementia care, supported living services, and respite care. We deliver high-quality care solutions to individuals in need, with other recruiting care professionals to support a wide range of public and private sector services, including health, social care, and housing.

Policy Scope

This policy applies to all persons working for John Hanks Care Ltd or on its behalf in any capacity, including employees at all levels, directors and officers and third parties including agency workers, contractors, suppliers, associated workers, volunteers, interns, agents, commissions and external consultants.

Purpose of the Policy

The policy describes how the Company will prevent, detect and report modern slavery in any part of its business or supply chain.

Our policies on Modern Slavery including Human Trafficking:

- Anti-Bribery Policy
- Equality, Diversity and Inclusion



- Anti-Bribery & Corruption
- Corporate & Social Responsibility
- Procurement Policy
- Compliance Policy
- Gift Giving

Our People

John Hanks Care Ltd have in place robust recruitment and screening processes for new employees to ensure that we do not inadvertently employ anyone who might be within the scope of the Act. Our recruitment processes comply with UK employment and regulatory laws. We ensure that these recruits are eligible to work in the UK and we carry out due diligence on employment checks, all employees are paid above the national living wage and provided with an employment contract, and we periodically benchmark our salaries and benefits to ensure they remain competitive.

Whistleblowing

Our whistleblowing policy sets out our commitment to ensure people are free to question things and raise anything they are concerned about and specifically modern slavery and human trafficking. We encourage people to speak up by raising issues with their Eric Mar, the Company Director.

Procurement and our supply chain

John Hanks Care Ltd suppliers are an important part of our success and our culture. We expect each business partner to conduct their business with the same commitment to ethical business practices as John Hanks Care Ltd. We conduct due diligence on all suppliers before allowing them to become part of our supply chain. This includes:

- Our current due diligence process includes a modern slavery assessment.
- When procuring goods and services, we additionally apply specific Terms and Conditions that require suppliers to comply with relevant legislation.
- Our onboarding process requires us to act in accordance with relevant legislation and regulations, with assurance required through evidence that the supply chain does not promote or take part in Modern Slavery activities.

Due Diligence Processes

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence processes include:

- Mapping the supply chain to assess particular product or geographical risks.
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Conducting supplier audits or assessments. High-risk suppliers are subject to more frequent audits and required to demonstrate steps taken to improve their practices.



- Taking steps to improve subcontracted supplier practices

Risk Assessment

We regularly assess potential risk areas in our supply chains and operations, considering:

- Geographical risk
- Sector risk
- Transaction risk
- Business partnership risk
- Healthcare risk (e.g. use of temporary or agency staff)
- Supplier practices and compliance risk (e.g. adherence to ethical standards and policies)

Training and Awareness

We provide training as part of the induction process to all employees to ensure a high level of understanding on the risks our business faces from modern slavery and human trafficking in our supply chains and our business. We provide updated training as necessary, including Modern Slavery Awareness Training, Safeguarding Training and Ongoing Behaviour Courses.

Further steps

We will continue to monitor our supplier base and to further develop our processes and procedures to ensure that we identify and mitigate risks related to slavery and human trafficking. We will continue to enhance the training that we provide to relevant staff.

We are continuing to review the way we do business with third parties through our corporate sustainability strategy. This includes a strategic engagement with the environmental and social standards our suppliers work within and the government that oversees them.

We will continue to support all staff to understand and respond to modern slavery and human trafficking, and the impact that each, and every individual working in the care sector can have in helping prevent and potential future victims of modern slavery and human trafficking safe.

This policy has been approved by the organisation's Director and will review and update it annually.

Continued (3) (See 7/2)

Date: 17/12/2024

Signature 

Job Title Director