

# Modern Slavery and Human Trafficking Statement

#### Financial Year Ending 31st December 2024

#### Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Routes Healthcare has taken during the financial year to ensure that modern slavery and human trafficking are not taking place within our business or supply chains.

Routes Healthcare is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking. This statement outlines our policies, procedures, and actions taken to uphold this commitment.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency and casual workers, volunteers, contractors, external consultants, third-party representatives and business partners.

#### **Our Organisation**

Routes Healthcare is a provider of specialist, high quality, clinically led provider of personalised healthcare commissioned home care services for people in their own individual homes in the UK. We work with both local authorities and Private pay customers and work in partnership with all our clients to deliver a high quality standard of service.

#### Responsibility for the policy

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

#### **Our Policies**

We operate a number of policies to ensure that we are conducting business in an ethical and transparent manner, including:

- Modern Slavery and Human Trafficking Policy Setting out our zero-tolerance approach and the actions we take to identify and prevent modern slavery
- **Recruitment Policy** Including conducting eligibility to work in the UK checks for all directly employed workforce



- Inclusion and Diversity Policy Providing fair pay rates, terms and conditions of employment, and access to training and development opportunities
- **Safeguarding Policies** For both adults and children, providing clear guidance on raising concerns
- Whistleblowing Policy Enabling all employees to raise concerns without fear of reprisals
- Anti-Harassment and Bullying Policy Protecting our workforce from poor treatment
- **Standards of Business Conduct** Explaining the manner in which we behave as an organisation

# Due Diligence Processes

We have undertaken the following due diligence processes to ensure modern slavery is not taking place within our business or supply chains:

- 1. **Risk Assessment**: We have conducted a risk assessment of our operations and supply chains to identify areas where there may be a higher risk of modern slavery.
- 2. **Supplier Vetting**: We have implemented a supplier vetting process that includes questions related to modern slavery and human trafficking.
- 3. **Contractual Provisions**: Our supplier contracts include provisions requiring compliance with the Modern Slavery Act 2015.
- 4. **Supply Chain Monitoring**: We monitor our supply chain for compliance with modern slavery requirements.

#### Training and Awareness

All employees receive information and training about modern slavery and human trafficking through:

- Mandatory safeguarding training for children and adults, which encompasses modern slavery awareness
- Access to our safeguarding policies and procedures
- Guidance on recognising the signs of modern slavery, including restricted freedom, behavioural indicators, working conditions, and financial indicators
- Clear reporting procedures for concerns

#### Reporting Procedures

We have established clear reporting procedures for instances of suspected modern slavery:

- 1. Employees are instructed to report concerns to their manager
- 2. Managers are required to report concerns to the Modern Slavery Helpline via telephone (08000 121 700) or online
- 3. All concerns are treated with confidentiality and handled according to safeguarding procedures



## **Effectiveness and Performance Indicators**

We measure the effectiveness of our approach through the following key performance indicators:

- No reports received indicating modern slavery practices
- Training completion rates on safeguarding which includes modern slavery awareness
- Supply chain compliance monitoring results

# Progress and Future Steps

During the past financial year, we have:

- 1. Updated our Modern Slavery and Human Trafficking Policy
- 2. Enhanced our training materials to ensure all staff can recognise indicators of modern slavery
- 3. Reviewed our supplier due diligence processes

In the coming year, we plan to:

- 1. Continue monitoring our supply chain
- 2. Maintain our current due diligence processes
- 3. Review our policies annually
- 4. Maintain awareness across our organisation

#### Approval

This statement has been approved by the Board of Directors who will review and update it annually.

## Signed:

Narinder Singh Chief Executive Officer Routes Healthcare

Date: 19<sup>th</sup> March 2025