



MODERN SLAVERY POLICY & STATEMENT

Purpose

- To maintain prevention of slavery and human trafficking

Scope

- All employees and others who enter the premises, such as agency workers, visitors and contractors.

Policy

1. Efficiency For Care Ltd is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses. 2. Efficiency For Care Ltd 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. Efficiency For Care Ltd provides appropriate training and awareness information for all of its staff. In particular: 4. 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. 5. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to Care Manager. 6. Reports surrounding these issues are taken extremely seriously by our board of directors, 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.

7. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:

- The percentage of suppliers who sign up to an appropriate code or provide their own modern slavery statements,
- 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.

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

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

- Corporate social responsibility policy,
- Anti-bribery / corruption policy, and
- Whistle-blowing policy.

This policy was adopted on 5 April 2018 after being agreed by our board of directors. It is reviewed annually and has been reviewed for 2023.

Modern Slavery Statement

This statement is made as part of Efficiency For Care Ltd.'s commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Efficiency For Care Ltd 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 April 2024- April 2025

Our Business

Efficiency For Care Ltd is a limited company operating in the recruitment sector. We place temporary, permanent and interim workers in the healthcare sector including Health Care Assistants and Nurses.

Efficiency For Care Ltd is an independent business.

Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff.

Our Policies

Efficiency For Care Ltd has a modern slavery policy available upon request.

Suppliers are expected to adhere to our Supplier Code of Conduct and Terms and Conditions concerning ethical treatment of all employees and temporary workers.

All employees must be provided with a clear contract of employment, which complies with local legislation.

Policy development and review

Efficiency For Care Ltd.'s policies are established by our Directors and senior leadership team, based on advice from HR professionals, industry best practice and legal advice. We review our policies annually, 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:

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 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.

Our staff are encouraged to bring any concerns they have to the attention of management. All TFS Healthcare employees have access to dedicated whistleblowing channels in order to raise concerns, questions or clarify processes. Efficiency For Care Ltd fully endorse transparency in this area.

Our Training

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

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.

Our staff are encouraged to discuss any concerns that they have.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, to safeguard against human trafficking or individuals being forced to work against their will.
2. Equal Opportunities. We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities
3. Safeguarding policies. We adhere to the principles inherent within both our safeguarding children and adults' policies. We provide clear guidance so that our employees are clear on how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.
4. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business, without fear of reprisals
5. Standards of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.