



VR CARE SOLUTIONS LTD.

Modern Slavery and Human Trafficking Policy

Policy Statement

The aim of this policy is to help our staff understand what constitutes modern slavery and human trafficking, what the various responsibilities concerning these issues are within VRCARE SOLUTIONS and how we plan to address the issues of modern slavery and human trafficking within our workplace. It is written in line with the safeguarding duties of local authorities under the Care Act 2014 (and equivalent applicable devolved government laws) to ensure any vulnerable adult is not subject to abuse by being a victim of modern slavery or forced labour, nor to any form of human trafficking.

It is also written to reflect the aims of the Modern Slavery Act 2015 that sets out the responsibilities and duties of corporate businesses and charities to prevent and avoid any dealings with any network or organisation implicated in modern slavery or human trafficking and to alert the police and other responsible authorities if they come across it.

Modern Slavery and Human Trafficking Definition

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

Examples of modern slavery:

- somebody is being paid below the National Minimum Wage
- forced into working more than 48 hours a week
- being denied the required amount of break time and rest between shifts, which goes against the Working Time Directive.



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Staff

We also do not employ staff under any conditions that might make us vulnerable to accusations or suspicions that we are employing people under conditions that would amount to modern slavery and exploitation as defined. All staff are subject to recruitment procedures that comply with both employment law and registration requirements with pay and conditions of employment that meet all statutory requirements.

If we have evidence that any of our employees are subject to exploitation and forced labour by third parties, we will exercise our duty of care to our employees by reporting our concerns as whistleblowers (refer to our whistleblowing policy) to the police or local unit responsible for investigating modern slavery to decide on further investigation or action. We will not act or discriminate against the employee if they are meeting all the required employment conditions and had been recruited in line with VRCARE SOLUTIONS's recruitment procedures.

Working Time Derivative:

The 48-hour week is defined as an average over a 17 week period. So, a 50-hour week followed by a 5 hour week would not be in breach of legislation.

Staff are also able to opt-out of the working time derivative and, if doing so, a copy must be kept in their personnel file.

Service Users

As a company providing staff for a care service, we ensure no vulnerable young person or adult in our care is subject to any conditions that meet the Care Act (and similar) definitions of modern slavery. If we or the service has any suspicions, information or evidence that any of its service users are victims of, or at risk of, becoming victims of modern slavery, exploitation or forced labour, it will take immediate protective action by alerting the appropriate safeguarding authority or police and apply all safeguarding procedures that then follow.

Third parties

We may deal with outside organisations (third parties) as well as the client (care service). We know that these organisations might form part of a longer supply chain. We make all reasonable efforts to ensure that no link in the supply chain is producing goods and services made under conditions of modern slavery or which might involve human trafficking.

We expect all third parties to have a similar zero-tolerance and due diligence approach to modern slavery and human trafficking and only work with organisations that have robust anti-modern slavery policies that operate in other parts of their supply chain and who comply with the Modern Slavery Act 2015.



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We explain in our replies to businesses who respond to tenders and adverts for goods and services that we will check if they employ people under conditions of modern slavery and if they do similar checks with other businesses in their supply chain. In doing so, we expect those businesses to have taken all reasonable efforts to exclude their suppliers from colluding with modern slavery practices.

All staff members, particularly those responsible for procuring goods and services, are expected to report any concerns about any issue or suspicion of modern slavery in any parts of their dealings at the earliest possible stage. Anyone raising concerns about slavery or human trafficking that affects VRCARE SOLUTIONS will be protected by our whistleblowing policy.

Training

All staff are made familiar with the anti-slavery policy particularly in respect of the safeguarding of vulnerable service users and they are expected to report any concerns in line with VRCARE SOLUTIONS's safeguarding policies and procedures.

Staff responsible for the procurement of goods and services will receive training so that they can ensure that the service is never implicated in any dealings that would render it vulnerable to accusations or charges that it might have breached modern anti-slavery law and how to respond to any suspicions or evidence of breaches in the law.

Compliance with the Policy

You must ensure that you read, understand, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistle blowing Policy as soon as possible. The manager will then contact the **Modern Slavery Helpline** via phone 08000 121 700 or report the concerns online at



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We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- continuous monitoring of our business and its supply chains to ensure we are free from slavery and human trafficking;
- continuing to require our contractors and supply chains to act in accordance with our Anti-Slavery policy when dealing with us; and
- ongoing education and promotion of our Anti-Slavery Policy along with a training program to ensure our staff understand and adopt our values.

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015

Monitoring and Review

The Company Secretary will check this policy is working properly and they will review it at least once a year. We will make improvements to the policy wherever we can.

Employees are invited to suggest any ways the policy can be improved.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.



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After reading this Policy, you should be able to:

- Understand what Modern Slavery and Human Trafficking Policy is and how the Modern Slavery and Human Trafficking Policy operates;
- Understand how Modern Slavery and Human Trafficking Policy operates at VRCARE SOLUTIONS and have an awareness of the actions we take in preventing, identifying and reporting concerns;
- Understand the role you play in Modern Slavery and Human Trafficking Policy.

If you have not understood any of these points, please ask your Line Manager or trainer for further help

Policy Review

A Director will review this policy at least once a year to make any updates needed.

Authorisation and Signature

This Policy is the authorised version agreed by the Directors of VRCARE SOLUTIONS.

All employees are expected to follow this policy and failure to do so could result in disciplinary action.