

Modern Slavery Statement

Section 54 of the Modern Slavery Act 2015 (the “Act”) requires that commercial organisations, supplying goods or services and operating in the UK, produce and publish an annual slavery and human trafficking statement. The Act includes guidelines for content and stipulations for approval and publication of the statement.

Iris Care Group make this Statement pursuant to Section 54 of the Act, for the financial year ending 30th April 2024, to set out our commitment, and steps taken and proposed, to prevent slavery and human trafficking in our corporate activities and to ensure that our organisation and supply chain is free from modern day slavery or human trafficking. Our statement will be published via the ‘Modern Slavery Statement’ link on the homepages of the Company’s websites within six months of financial year end, and will be submitted for inclusion in the government-run online modern slavery statement registry.

Recognising that slavery and human trafficking remains a hidden blight on our global society, we all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Iris Care Group has zero tolerance to slavery and human trafficking and all staff, contractors and third-party partners have a responsibility to take a robust approach to preventing modern day slavery and human trafficking.

Iris Care Group is committed to ensuring compliance standards are met and maintained, as outlined in our Modern Slavery and Human Trafficking Policy¹, which is reviewed every three years and applies to all employees, workers, contractors and to any business or organisation that has any sort of a business relationship with our Company.

ORGANISATION’S STRUCTURE

Iris Care Group combines the complimentary services and specialist multi-disciplinary teams of two organisations experienced in working with people with mental health and learning disabilities:

- Ludlow Street Healthcare Ltd, established in 2005, transition-focused healthcare, including specialist assessment, treatment, rehabilitation, education and bespoke step-down services for adults, as well as further education for young adults, with complex mental health conditions; and
- Holmleigh Care Homes, founded in 1999, a specialist provider of essential residential care, supported living and domiciliary care services for adults with a range of needs, including learning disabilities, autism, mental health issues, physical disabilities, acquired brain injury, sensory loss, and age-related needs.

¹ Our **Modern Slavery Policy** can be made available on request and in other formats, such as large print.

Together we offer a more integrated service for the people we support, their families and advocates, the Local Authorities, Community Health Councils, and the NHS.

OUR BUSINESS

Iris Care Group is organised into services with a Service Lead in each service reporting directly to their Operations Director – Hospitals / Social Care (England/Wales), who in turn reports directly to the Chief Executive Officer or Chairperson. Our services are regulated by the Care Quality Commission (CQC), Care Inspectorate Wales (CIW), Healthcare Inspectorate Wales (HIW) and Estyn. Our contracts come from Local Authorities, Integrated Care Boards (ICBs) and Local Health Boards (LHBs).

OUR SUPPLY CHAINS

Iris Care Group is committed to ensuring that our business and chain of suppliers do not tolerate modern slavery, forced labour or human trafficking.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We have zero tolerance to slavery and human trafficking, and we are committed to ensuring that there is no modern day slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain or business.

Equal Opportunities, Safeguarding and Whistleblowing Policy

Iris Care Group encourage all our employees and workers to report any concerns in line with our Whistleblowing and Safeguarding policies. Our Whistleblowing Policy is designed to make it easy for workers to make disclosures, without fear of retaliation. The policy encourages people to raise concerns directly with their Line Manager, HR Department, designated “Speak up Guardian” or any member of the senior management team. We also operate an external whistleblowing helpline aimed at encouraging staff to report any/all concerns in this regard.

Everybody, including colleagues, suppliers, candidates and clients are encouraged to report any issue or concerns about potential unethical business practices, such as fraud, bribery, slavery or human trafficking and we are committed to working with the local authorities to ensure such concerns are investigated properly and dealt with efficiently and effectively.

Our staff are encouraged to bring all and any concerns they have to the attention of management. We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and all contractors to comply with our policy and values. All our directors are responsible for compliance in their respective departments and for their supplier relationships.

Recruitment

As an Equal Opportunities organisation, Iris Care Group welcomes candidates via a number of sources from online job searches, employee referrals and local recruitment initiatives. We take a

rigorous approach in recruiting personnel. We converse directly with all candidates to discuss vacancies and opportunities and to confirm details of any offer made. If a recruitment agency is working on our behalf to source candidates, we work with trusted companies governed by the Recruitment & Employment Confederation (REC) and follow Government workforce legislation, data protection acts (GDPR), DBS and also associated to regulatory bodies such as the NMC, CQC. We have robust procedures in place for the vetting of new employees and workers and ensure that we are able to confirm their identities, their right to work in the UK and that they are paid directly into an appropriate, personal bank account.

For any employee or worker with a work permit or visa, we carry out regular audits and management of these documents to ensure they remain valid. Iris Care Group mitigates the risk of modern slavery occurring in its sponsorship workforce by ensuring that directly employed staff are recruited following thorough HR and Recruitment processes. Once in the UK, we provide support through regular interactions with HR, Learning and Development and the relevant service to ensure that the rights and welfare of the staff member are preserved. Pastoral care and support with accommodation searching, work life skills and general emotional wellbeing support continues throughout the employment lifecycle. Iris Care Group always applies national minimum wage thresholds in line with the prevailing legislation.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Due diligence processes are in place, and regularly reviewed, to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

Such processes apply to:

- Procurement, to ensure thorough vetting of service providers or suppliers before appointment, through checklists, policies and processes, to maintain our 'Preferred Suppliers List'.
- Recruitment and onboarding, to ensure that all prospective employees, including agency workers, are legally entitled to work in the UK and are free from forced labour, coercion or deprivation of freedom.

We commit to the regular review and update of our procedures / policies / guidance documents to ensure that they include reference to the duties of Iris Care Group and individuals and, where applicable, information on the Act. In addition to the Modern Slavery Policy, relevant internal documents include those relating to:

- Recruitment
- Employment
- Conduct and Standards
- Safeguarding
- Procurement
- Raising concerns

Iris Care Group is committed to regular audits and to ongoing risk assessment and management to ensure that we promptly identify and mitigate risks and concerns. In support of such efforts, we are committed to the regular review of supply chain policies, codes of conduct and working practices, and systems are in place to encourage the reporting of concerns and the protection of whistleblowers. Furthermore, we commit to fully investigate all reports of slavery and / or human trafficking whilst providing support to the individual making the allegation.

TRAINING

To ensure a high level of understanding of the risks of modern day slavery and human trafficking in our supply chains and our business, all staff receive training and support that is appropriate to their role to embed the principles of this Statement and relevant policies, and to ensure that staff are aware of, and able to respond to, incidents of slavery and human trafficking within care settings.

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, by way of our Whistleblowing Policy or external whistleblowing helpline.
- Management teams, responsible for compliance within their respective departments and in their supplier relationships, have been trained accordingly.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and it constitutes our slavery and human trafficking statement for the financial year.

Board Approval date: 20th June 2024

Signed:



Print Name: Yvonne Murray

Job Title: People Director

Date: 20th June 2024