MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

2026 | Version 1.0 | Effective upon approval | Reviewed annually

Document details	Information
Organisation	Divine Health Services Limited | Company no. 07234900
Registered office	Congress House, Office 10, Suite 1, 4th Floor, 14 Lyon Road, Harrow, England, HA1 2EN
Accountable director	Sylevester Dairai Mandisodza, Managing Director
Statement period	First issued November 2026; effective upon approval; annual review due November 2027
Applies to	Our care operations, employees, agency arrangements, recruitment activities, contractors and suppliers

1. Our commitment

Divine Health Services Limited has zero tolerance of slavery, servitude, forced or compulsory labour, human trafficking, debt bondage and exploitation in any part of our operations or supply chain. We are committed to treating people fairly, protecting workers' rights and taking appropriate action where exploitation is suspected or identified.

This statement sets out our arrangements for identifying, preventing and responding to risks of exploitation, and the practical measures we will use to strengthen oversight of our workforce and supply chain.

2. Our organisation and areas of risk

We provide domiciliary care and associated support to adults in their own homes. Our care activities are delivered through staff working in the community, supported by management, administrative systems, care equipment and third-party suppliers. The most relevant risks arise in recruitment and employment, particularly where people may be dependent on others for work or accommodation; in labour supplied by agencies or intermediaries; and in the purchasing of goods and services.

We recognise that people recruited internationally may face additional risks, including misleading job offers, recruitment debt, intimidation, threats about immigration status, unfair deductions, restricted movement or pressure to remain in an unsuitable role. We also recognise the importance of protecting vulnerable people using our care services from exploitation or trafficking.

3. Recruitment and fair treatment of workers

We will recruit staff through fair, transparent and lawful procedures. Employment conditions, pay arrangements, hours and duties must be explained clearly before employment begins. We will apply appropriate identity, right-to-work, reference and Disclosure and Barring Service checks in accordance with the duties relevant to each role.

- No worker will be required to surrender their passport, original identity documents or personal possessions as a condition of employment.
- We will not charge prospective workers recruitment fees for securing employment. Any lawful repayment terms, where applicable, must be transparent, proportionate and individually reviewed.
- Workers are free to raise concerns, leave employment in accordance with lawful contractual arrangements and seek independent advice without threats or intimidation.
- Pay, working time, rest breaks and lawful deductions will be reviewed against applicable employment requirements. We will challenge any indication of coercion or financial exploitation.
- Where we recruit internationally, we will follow the applicable Code of Practice for the International Recruitment of Health and Social Care Personnel and undertake checks on any recruitment intermediaries used.

The Registered Manager will ensure any concern about recruitment checks, worker welfare or labour exploitation is assessed promptly. Where necessary, recruitment activity or a supplier engagement will be paused while a risk is investigated and appropriate safeguarding arrangements made.

4. Supply chain and third-party due diligence

Our suppliers may include recruitment and staffing services, technology providers, training organisations, cleaning services, equipment and consumables suppliers, and other businesses supporting care delivery. We will apply a proportionate, risk-based approach to supplier selection and review.

- We will seek assurance that relevant suppliers comply with employment, immigration, health and safety and modern slavery legislation.
- We will take account of the supplier’s location, type of labour used, subcontracting arrangements and the potential vulnerability of workers.
- Higher-risk labour suppliers or recruitment agents may be required to explain their recruitment practices, worker-paid fees, right-to-work arrangements, grievance procedures and use of subcontractors.
- Where credible concerns arise, we will request corrective action, investigate further, suspend new work where appropriate or end the relationship if serious exploitation cannot be satisfactorily addressed.

5. Safeguarding, reporting and response

Any employee or other person may raise a modern slavery concern with the Registered Manager or through the Company’s safeguarding, whistleblowing or complaints procedures. Concerns involving the Registered Manager may be escalated through the appropriate independent safeguarding or external reporting channels. People raising genuine concerns will be supported and must not suffer victimisation.

Possible indicators include fearfulness, restricted communication or movement, threats, confiscated documents, signs of excessive debt, unexplained deductions, unsafe living or working conditions, or another person exercising unusual control over an individual.

Where an immediate threat to life or safety exists, emergency services must be contacted on 999. Other concerns will be assessed and referred, as appropriate, to the police, local authority safeguarding team, the Gangmasters and Labour Abuse Authority or the Modern Slavery and Exploitation Helpline (08000 121 700). Referrals through the National Referral Mechanism will be considered with the relevant authorised first responder and applicable consent and safeguarding requirements.

The Company will protect confidentiality, keep appropriate records, cooperate with lawful investigations and prioritise the safety, wishes and welfare of any potentially exploited person. We will not treat a concern as closed simply because a supplier denies wrongdoing.

6. Policies, management and training

This statement is supported by our QCS Corporate Social Responsibility and Environmental Sustainability Policy (QA11), recruitment and employment procedures, safeguarding policies, equality and diversity arrangements, whistleblowing, complaints, duty of candour, incident management and quality assurance processes, as applicable.

Sylevester Dairai Mandisodza, Managing Director, has overall responsibility for this statement. Managers will communicate expectations to staff, review relevant recruitment and supplier concerns, arrange appropriate training and ensure serious issues are escalated. Staff will be reminded of common warning signs and how to make a report through induction, briefings or refresher learning according to their roles.

7. Monitoring and improvement commitments

We will monitor the effectiveness of our approach using proportionate management records. In the first review period, management will establish and maintain the following evidence:

Area	Management review and evidence
Recruitment	Sample recruitment and onboarding records for required checks, contracts and any recruitment-agent involvement.
Worker welfare	Record and follow up any complaints, confidential disclosures, pay concerns or indicators of coercion.
Suppliers	Maintain a list of material labour/recruitment suppliers, record risk-based checks and action taken on concerns.
Awareness	Record communication of modern slavery reporting routes and relevant staff briefings.
Incidents	Record referrals, safeguarding decisions, corrective actions, responsible persons and review dates.

The Company will review this statement at least annually and sooner if there is a significant change in its operations, recruitment arrangements, law or identified risks. The review will consider any concerns reported, due diligence completed, training delivered and practical improvements needed.

8. Approval and publication

This statement has been prepared for public publication as part of Divine Health Services Limited's commitment to ethical employment and responsible purchasing. It will be made available on the Company website and reviewed annually. Our organisation will assess each year whether it falls within the statutory turnover criteria for mandatory reporting under section 54 of the Modern Slavery Act 2015.

I approve this Modern Slavery and Human Trafficking Statement on behalf of Divine Health Services Limited and accept responsibility for overseeing its implementation and review.

Approved by:



Sylevester Dairai Mandisodza

RM, NI and Managing Director | Divine Health Services Limited

Date: 2 November 2026

Reviewed: Annually