



AVIANA Health Care Modern Slavery & Human Trafficking Statement (2023-2024)



Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives individuals of their liberty and dignity for another's gain. It affects millions globally, including in developed countries, through various forms of exploitation such as forced labour, debt bondage, and human trafficking. Every company is at risk of being implicated in this crime through its operations and supply chains.

At Aviana Health Care, we adopt a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chain. This document outlines the actions we have taken to understand all potential modern slavery risks related to our business and to implement measures to prevent slavery and human trafficking during the financial year 2024. Our internal policies support staff's understanding of modern slavery and human trafficking.

This statement demonstrates our commitment to eliminating unlawful discrimination, advancing equality of opportunity, and fostering good relations with respect to the characteristics protected by equality law. We aim to promote awareness of concerns surrounding slavery and human trafficking and to commit Aviana Health Care to addressing these issues in all forms. We will produce an annual statement and implement and enforce effective systems and controls to ensure that modern slavery does not occur within Aviana Health Care or any associated third parties. Identification, protection, care, and support for victims of modern slavery and human trafficking are at the heart of our safeguarding procedures.

Our Business and Supply Chains

Aviana Health Care operates within the healthcare sector, providing services as a:

- Homecare agencies
- Supported living

Service specialism

- Caring for adults over 65 yrs
- Caring for adults under 65 yrs
- Dementia
- Learning disabilities
- Mental health conditions
- Physical disabilities
- Sensory impairments

Local authority

Cheshire East

Operating in the United Kingdom, our supply chains include providers of medical supplies, healthcare equipment, pharmaceuticals, facilities management, and recruitment agencies. We are committed to establishing relationships of trust and integrity with all our suppliers. Our supplier selection and onboarding procedures include rigorous due diligence to assess the supplier's reputation, compliance with health, safety, and environmental standards, and the provision of references.

We have not been made aware of any allegations of human trafficking or slavery activities against any of our suppliers, staff, or within our recruitment pipeline. Should any allegations arise, we will act immediately against the supplier or individual involved and report the matter to the relevant authorities.

Risk Assessment

We recognize that certain areas of our supply chain may pose higher risks of modern slavery. In the past year, we conducted a thorough risk assessment by considering:

- The risk profile of individual countries based on the Global Slavery Index
 - The nature of the business services rendered by the suppliers
 - The presence of vulnerable demographic groups in the supply chain
 - Analysis of news reports and insights from labour and human rights organizations
- Based on this assessment, we have identified higher-risk areas and implemented tailored risk controls to mitigate these risks.

Enhanced Risk Assessment on Safer Recruitment

While Aviana Health Care employs rigorous recruitment procedures, we acknowledge the evolving tactics of those who seek to undermine these systems. Recent evidence indicates that some candidates are coached to evade detection, posing a significant threat to our goal of eliminating modern slavery. Our enhanced risk assessment addresses these challenges.

Recognizing Recruitment Risks

1. Coaching of Candidates:

- **Evidence:** Reports indicate that some candidates are being coached by third parties to provide false information or present falsified documents to pass our recruitment checks.
- **Implications:** This undermines the effectiveness of our safer recruitment processes and increases the risk of modern slavery within our workforce.

2. Vulnerability Exploitation:

- **Evidence:** Vulnerable individuals, such as migrants or those from disadvantaged backgrounds, are particularly susceptible to exploitation by unscrupulous recruiters.
- **Implications:** These individuals may be coerced or deceived into participating in fraudulent recruitment schemes.

3. Complex Supply Chains:

- **Evidence:** Complex and extended supply chains increase the difficulty of monitoring and ensuring compliance with ethical recruitment practices.
- **Implications:** This complexity can obscure the presence of modern slavery, making it harder to detect and eliminate.

Risk Heat Table

To better understand and manage these risks, we have developed a risk heat table that assesses the likelihood and impact of various recruitment-related risks. This table helps prioritize areas that require immediate attention and more stringent controls.

Risk Factor	Likelihood (1-5)	Impact (1-5)	Risk Score (Likelihood x Impact)	Risk Level	Mitigation Actions
Coaching of Candidates	4	4	16	High	Advanced screening techniques, behavioural analysis
Vulnerability Exploitation	5	5	25	Critical	Enhanced background checks, collaboration with NGOs
Complex Supply Chains	3	4	12	Medium	Regular audits, supplier training
Fraudulent Documentation	4	4	16	High	Biometric checks, document authenticity verification
Unethical Recruitment Agents	3	5	15	High	Rigorous supplier due diligence, ongoing monitoring

Enhanced Risk Controls

To mitigate these risks, Aviana Health Care has implemented the following enhanced controls:

1. Advanced Screening Techniques:

- **Enhanced Verification:** Use of advanced verification technologies, such as biometric checks and document authenticity verification, to detect fraudulent documents.
- **Behavioural Analysis:** Incorporation of behavioural analysis techniques during interviews to identify inconsistencies or signs of coaching.

2. Rigorous Background Checks:

- **Deepened Scrutiny:** Extending background checks to include more comprehensive verification of previous employment, education, and personal references.
- **Cross-Referencing:** Cross-referencing information with multiple sources to ensure its accuracy and authenticity.

3. Training and Awareness:

- **Specialized Training:** Providing specialized training for HR and recruitment staff to recognize signs of candidate coaching and deception.
- **Continuous Updates:** Regular updates and refreshers on the latest tactics used by those attempting to undermine recruitment processes.

4. Stakeholder Collaboration:

- **Partnerships with Law Enforcement:** Strengthening collaboration with law enforcement and other relevant bodies to share intelligence and best practices.
- **Engagement with NGOs:** Partnering with NGOs to gain insights and support for detecting and addressing modern slavery risks in recruitment.

5. Robust Reporting Mechanisms:

- **Anonymous Reporting:** Enhancing anonymous reporting mechanisms for employees and candidates to report any suspicious activities or behaviours.
- **Encouraging Disclosure:** Creating a supportive environment that encourages individuals to come forward and report any concerns without fear of retaliation.

Evidence and Monitoring

Aviana Health Care is committed to continuously monitoring and evaluating the effectiveness of our recruitment processes. This includes:

1. Regular Audits:

- **Audit Frequency:** Conducting regular audits of recruitment practices and procedures to ensure compliance and identify areas for improvement.
- **Independent Reviews:** Engaging independent auditors to provide an unbiased assessment of our recruitment processes.

2. Data Analysis:

- **Tracking Metrics:** Monitoring key metrics, such as the number of detected fraudulent applications and the outcomes of background checks.
- **Trend Analysis:** Analysing trends and patterns in recruitment data to identify emerging risks and inform proactive measures.

3. Case Studies and Feedback:

- **Real-World Examples:** Documenting case studies of identified risks and successful interventions to highlight the importance and impact of enhanced controls.
- **Stakeholder Feedback:** Gathering feedback from employees, candidates, and other stakeholders to continuously improve our recruitment practices.

Case Study Example: Enhanced Background Checks

Situation: During routine recruitment, an applicant presented a university degree to pass the English proficiency test. However, during the interview stage, it was evident that the candidate's level of English was poor. Additionally, there were challenges in verifying the candidate's references, with previous references found to be fabricated.

Action Taken: The recruitment team used advanced verification technology to validate the degree and cross-check the candidate's claimed education with multiple databases. Behavioural analysis during the interview further revealed discrepancies in the candidate's communication skills. Numerous attempts were made to obtain genuine references from the candidate, but as of the final deadline, no credible references were received. The candidate remained evasive and noncompliant regarding mandatory employment details.

Outcome: The application was flagged for potential fraud, and further investigation confirmed the use of a falsified degree and fabricated references. The offer of employment and sponsorship was cancelled, preventing potential exploitation and ensuring the integrity of our recruitment process.

Implementation and Enforcement

To ensure the effective implementation and enforcement of our policies, we have integrated specific measures and monitoring systems into our daily operations. Our comprehensive induction process educates employees on modern-day slavery, and the employee handbook, along with our electronic HR portal, continually highlights updated policies on modern slavery.

Policies

Aviana Health Care Ltd maintains several policies designed to identify and prevent slavery and human trafficking in our operations and supply chain:

1. **Whistleblowing Policy:** Encourages all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistleblowers and ensure their concerns are addressed promptly.
2. **Modern Slavery and Human Trafficking Policy and Procedure:** Outlines our commitment to combating modern slavery, the steps we take to prevent it, and the procedures for reporting and addressing any instances of slavery or trafficking.
3. **Code of Conduct:** Sets out the actions and behavior expected of employees when representing the business, emphasizing our commitment to ethical conduct and compliance with legal standards.
4. **Purchasing Code:** Updated to explicitly reference slavery and human trafficking, outlining our expectations of suppliers regarding labor practices and the steps we take to ensure compliance.

Relevant Legislation

We comply with all relevant legislation in our efforts to combat modern slavery, including:

- The Modern Slavery Act 2015
- Health and Safety at Work etc. Act 1974
- Human Rights Act 1998
- The Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2012

Supplier Due Diligence

We conduct thorough due diligence on all new suppliers during onboarding and regularly review existing suppliers. This includes:

- **Risk Assessments:** Evaluating the risks associated with the provision of specific services and the supplier's country of operation.
- **Audits:** Regularly auditing suppliers to assess their compliance with health and safety standards, labour relations, and employment contracts.
- **Improvement Requirements:** Mandating improvements to any substandard employment practices identified during audits.
- **Sanctions:** Imposing sanctions on suppliers that fail to improve their performance in line with our requirements, up to and including termination of contracts.

We require all suppliers to attest that:

- They do not use any form of forced, compulsory, or slave labor.
- Their employees work voluntarily and are entitled to leave work.
- They provide each employee with an employment contract that includes a reasonable notice period for terminating their employment.
- They do not require employees to post a deposit/bond and do not withhold their salaries for any reason.
- They do not require employees to surrender their passports or work permits as a condition of employment.

To further support our suppliers in meeting these standards, we offer training and resources aimed at improving their practices and compliance.

Awareness

Aviana Health Care Ltd has disseminated our policies on modern slavery to all staff. This information is available in our staff handbook, and a rigorous induction program ensures employees are aware of their rights and how to identify modern slavery. Our policy on modern slavery is also available on our HR platforms and included in the employee policy suite for easy access by all staff members.

Example: Induction and Ongoing Training

Situation: A new employee joins Aviana Health Care and undergoes the comprehensive induction process.

Action Taken: The induction includes detailed training on modern slavery, emphasizing its various forms, how to recognize signs, and the importance of reporting any suspicions. The employee handbook and electronic HR portal continually highlight updated policies on modern slavery.

Outcome: The new employee becomes well-versed in identifying and responding to potential modern slavery situations, contributing to a vigilant and informed workforce.

Ethical and Responsible Recruitment

As an ethical and responsible employer, Aviana Health Care is committed to ensuring that our recruitment processes are free from modern slavery and human trafficking. Our application process is clear, transparent, and requires candidates to follow an ethical process to join our organization. This includes:

- **Background Checks:** Conducting thorough background checks to ensure the suitability and legitimacy of candidates.
- **Declarations:** Requiring candidates to declare that they are acting of their own free will and are not being coerced.
- **Modern Slavery Statement:** Mandating that candidates read and understand our modern slavery statement as part of the recruitment process.
- **Interview Confirmation:** Reinforcing our zero-tolerance policy for third-party involvement during the interview process. Candidates must confirm that they are acting in their own capacity to proceed with the application.

All candidates and staff members are encouraged to use our dedicated hotline to report any suspicion of modern slavery confidentially. **Contact us at hr.legal@avianahealthcare.co.uk or call 01270 343670 to report in confidence.**

Safer Recruitment

All staff engaged with providing services at Aviana Health Care are subject to thorough and rigorous recruitment procedures, including:

- **DBS Check:** Ensuring the criminal record and suitability for working with vulnerable groups.
- **Identity Check:** Verifying the true identity of the candidate.
- **Confirmation of Validity to Work in the UK:** Ensuring the right to work legally in the UK.
- **Employment History:** Reviewing past employment to assess reliability and performance.
- **Suitability for the Role:** Ensuring the candidate's skills and experience match the job requirements.
- **References:** Contacting previous employers to verify the candidate's background and work history.

These steps minimize the chance of employing a person that has been, or is subject to, slavery or human trafficking. Aviana Health Care will follow the Right to Work Checks Policy and Procedure to ensure a robust and fair process at all times.

Aviana Health Care will only use staff provided by third-party organizations (such as agencies) that are either registered with the regulator or who can confirm that the staff being supplied are free to work in the UK and meet all the requirements for the role being provided.

Recruitment Risks

Some suppliers may seek to recruit additional workers to meet increased demand. Aviana Health Care will ensure that rigorous recruitment checks are maintained and that suppliers adhere to the same robust processes to ensure that vulnerable workers are not exploited by third parties seeking to profit from heightened demand.

Health and Safety of Workers

As a responsible organization, it is crucial that the relevant local or national government policies are implemented throughout the supply chain at Aviana Health Care. We are committed to providing a safe and healthy working environment for all our employees and workers within our supply chain. Our health and safety policies include:

- **Regular Health and Safety Audits:** Ensuring compliance with health and safety standards across our operations and supply chain.
- **Training Programs:** Providing comprehensive health and safety training to all employees.
- **Incident Reporting:** Encouraging the reporting of any health and safety concerns without fear of retaliation.

Training

In addition to the awareness program, Aviana Health Care has rolled out a new e-learning course and updated policies on modern slavery for all employees and supplier contacts. This training covers:

- **Various Forms of Modern Slavery:** Educating employees on the different ways people can be held and exploited.
- **Problem Scope and Risk:** Highlighting the extent of the issue and the specific risks to our organization.
- **Identifying Signs of Slavery:** Training employees to recognize indicators of slavery and human trafficking, such as unrealistically low prices or poor working conditions.
- **Response Procedures:** Outlining the steps employees should take if they suspect slavery or human trafficking.
- **Supplier Escalation:** Instructing suppliers on how to escalate potential issues within their own organizations.
- **External Support:** Providing information on external help available for victims of slavery.
- **Supplier Guidance:** Offering terms and guidance to suppliers regarding slavery policies and controls.
- **Steps for Non-Compliance:** Detailing the actions Aviana Health Care Ltd will take if a supplier fails to implement anti-slavery policies or controls.
- **Employee Attestation:** Requiring employees to affirm their commitment to Aviana Health Care Ltd.'s anti-slavery policy.
- To ensure the effectiveness of our training, we will evaluate the impact through regular assessments and feedback sessions with employees and suppliers.

Measuring Performance

Aviana Health Care Ltd has defined a set of key performance indicators (KPIs) and controls to combat modern slavery and human trafficking within our organization and supply chain. These include:

- **Training Completion Rates:** Monitoring the number of employees who have completed mandatory training on modern slavery and human trafficking.
- **Supplier Compliance:** Tracking the number of suppliers who have filled out our ethics questionnaire and implemented equivalent awareness and training programs.
- **Reporting and Incidents:** Recording the number of reports made by employees indicating their awareness and sensitivity to ethical issues.
- **Human Rights Team Findings:** Reviewing the findings of our cross-functional Human Rights team, which evaluates how effectively we are addressing modern slavery and human trafficking.

We will also include specific case studies and examples of how our policies have been successfully implemented, and what improvements have been made based on the annual reviews. These case studies will provide tangible evidence of our commitment and the effectiveness of our actions.

Example: Supplier Compliance Audit

Situation: A supplier in our supply chain was due for a routine compliance audit.

Action Taken: During the audit, we discovered several labor practices that did not meet our standards. We mandated immediate improvements and provided resources to help the supplier comply with our ethical standards.

Outcome: The supplier made the necessary changes within the stipulated timeframe, improving their labour practices. This not only enhanced the working conditions for their employees but also strengthened our supply chain integrity.

Reporting and Whistleblowing

Employees, customers, and suppliers are encouraged to report any suspicions or instances of modern slavery and human trafficking. The reporting process is designed to be safe, confidential, and accessible. All reports will be investigated by a trained member of staff, and we may share the findings with relevant authorities to ensure comprehensive action is taken.

Reporting Contacts:

- Migrant Help: 01304 203977 or 07766 668781
- The Salvation Army: 0300 303 8151
- TSA Modern Slavery Hotline: 0800 808 3733
- ACAS: 0300 123 1100
- Employment Agency Standards: 020 7215 4477 or email: eas@beis.gov.uk
- Care Quality Commission: 03000 616 161 or email: enquiries@cqc.org.uk
- Gangmasters and Labour Abuse Authority: 0800 432 0804 or email: intelligence@gla.gov.uk
- UK Modern Slavery and Exploitation Helpline (Unseen UK): 08000 121 700
- Police Emergency: 999
- Police non-emergency: 101

Community and Stakeholder Engagement

Aviana Health Care recognizes the importance of engaging with the wider community and stakeholders to effectively combat modern slavery. We collaborate with local authorities, non-governmental organizations (NGOs), and other relevant bodies to share best practices, resources, and support initiatives aimed at eradicating modern slavery. Our engagement efforts include:

- **Partnerships with NGOs:** Working with organizations such as Unseen UK, The Salvation Army, and others to support victims and prevent modern slavery.
- **Community Awareness Campaigns:** Participating in local and national campaigns to raise awareness about modern slavery and human trafficking.
- **Stakeholder Meetings:** Regularly meeting with stakeholders to discuss progress, share insights, and develop strategies to combat modern slavery.
- **Continuous Improvement**

Aviana Health Care is committed to continuous improvement in our efforts to combat modern slavery. We regularly review and update our policies, procedures, and training programs to reflect best practices and evolving standards. Our continuous improvement efforts include:

- **Annual Policy Review:** Conducting an annual review of our modern slavery policies and procedures to ensure they remain effective and up to date.
- **Feedback Mechanisms:** Implementing feedback mechanisms for employees, suppliers, and other stakeholders to provide input on our anti-slavery initiatives.
- **Benchmarking:** Comparing our practices against industry standards and leading practices to identify areas for improvement.
- **Transparency and Reporting**

Transparency is a key component of our commitment to combat modern slavery. Aviana Health Care is dedicated to providing clear and comprehensive reporting on our efforts and progress. Our transparency initiatives include:

- **Annual Modern Slavery Statement:** Publishing an annual statement detailing our actions, progress, and plans to combat modern slavery.
- **Public Reporting:** Making our modern slavery statement and related reports available on our website and other public platforms.
- **Stakeholder Updates:** Regularly updating stakeholders on our efforts and progress through meetings, reports, and other communications.
-

Conclusion

Aviana Health Care is unwavering in its commitment to eradicating modern slavery and human trafficking within our operations and supply chain. By implementing robust policies, engaging with stakeholders, and continuously improving our practices, we aim to create a safe and ethical environment for all employees and partners. We encourage all employees, suppliers, and stakeholders to join us in this important mission and to report any concerns or suspicions of modern slavery through the appropriate channels.

This statement covers the period from 1 April 2024 to 31 March 2025 and has been approved by the board of Aviana Health Care Ltd at the board meeting on 30 January 2024.

© June 16, 2024, Aviana Healthcare. All rights reserved.

**No part of this document may be reproduced without permission. Contact:
Aviana Healthcare, Grosvenor House, 3 Chapel Street, Congleton, Cheshire,
CW12 4AB**