

MODERN ANTI-SLAVERY STATEMENT

(We are NOT a relevant commercial organisation" under section 54 of the Modern Slavery Act 2015 so the law does not require us to publish a Modern Slavery statement (the legal threshold is £36 million). We are publishing one anyway. Why? Because modern slavery and human trafficking have no place in social care or our supply chains. This statement explains what we do to play our part in preventing harm.)

At GN Wellsprings Care Services Ltd, we uphold the principle that every individual is entitled to liberty and dignity, vehemently opposing any form of slavery or coerced labour. Our commitment is unwavering in the battle against all manifestations of human trafficking, enforced labour, and contemporary slavery. We dedicate ourselves to eradicating these deplorable practices from our global community.

We acknowledge the multifaceted nature of modern slavery, which encompasses enforced labour, debt bondage, compulsory marriage, and the exploitation of minors. Such practices are a blatant disregard for human decency and infringe upon fundamental rights. It is imperative that we exert all efforts to guarantee the freedom of every individual from coercion and exploitation.

We urge individuals, corporations, and governmental bodies to engage in the fight against modern slavery. This entails promoting awareness, backing organisations combatting human trafficking, and enacting policies that deter and penalise these offences.

Through collective endeavour, we aspire to forge a society where every person can enjoy liberty, dignity, and respect.

Modern slavery is a grave injustice and ethically condemnable, stripping individuals of their freedom and dignity for another's benefit. It poses a significant challenge for countless people globally, including those in developed nations, who find themselves trapped in various forms of slavery. Every business is susceptible to being implicated in this crime, both directly and through its supply chain.



GN Wellsprings Care Services Ltd adopts a stringent no-tolerance stance towards modern slavery, fully dedicating itself to preventing slavery and human trafficking within our operations and supply chain. We have implemented specific measures to combat modern slavery, as detailed in our statement. This document outlines the initiatives undertaken to comprehend all potential risks of modern slavery associated with our business and to implement preventive strategies during the financial year commencing 1 November 2024 and ending 31 October 2025.

Our Business and Supply Chains

Brief overview:

- GN Wellsprings Care Services Ltd specialises in healthcare recruitment, social care and other healthcare services.
- Our operations are based in the United Kingdom.

We cultivate trustworthy and integral relationships with all our suppliers, grounded on mutually beneficial factors. Our supplier assessment and integration process involves thorough due diligence concerning the supplier's reputation, adherence to laws, compliance with health, safety, and environmental standards, and references.

To date, no reports of human trafficking or slavery activities within our supply network have come to our attention. However, should any allegations arise, we would promptly address the issue with the supplier and report it to the relevant authorities.

Risk Assessment

Our risk assessment procedures aim to pinpoint potential risk areas within our supply chain, adopting suitable measures to mitigate these risks. Over the past year, we have evaluated our supply chain risks by considering:

- Country-specific risk profiles based on the Global Slavery Index

The nature of services provided by suppliers

- The presence of vulnerable demographic groups
- Insights from news analysis and labour and human rights organisations

This assessment informs our response strategy and the risk mitigation controls we implement.

Policies

We periodically review our policies and procedures to ensure they effectively prevent slavery and forced labour and comply with all applicable laws and regulations. GN Wellsprings Care Services Ltd enforces several policies to detect and prevent slavery and human trafficking in our operations, including:

- Whistleblowing Policy: We encourage all employees, customers, and suppliers to report any suspicions of slavery or human trafficking without fear of retribution. A confidential helpline is available to safeguard the identities of whistleblowers.
- Code of Conduct: This code outlines the expected actions and behaviours of our employees when representing the company, promoting high standards of conduct and ethical behaviour both domestically and in managing our supply chain.
- Purchasing Code: We have revised our Purchasing Code and supplier contracts to explicitly address slavery and human trafficking.

Supplier Due Diligence

GN Wellsprings Care Services Ltd is committed to working with suppliers who share our dedication to preventing slavery and forced labour. We conduct thorough due diligence on all new and existing suppliers, which includes:

- Assessing risks associated with specific services

Conducting audits on suppliers, focusing on health and safety standards, labour relations, and employment contracts

- Demanding improvements for substandard employment practices
- Penalising suppliers that fail to meet our standards

We require suppliers to confirm that:

- They do not engage in any form of forced, compulsory, or slave labour
- Their employees work voluntarily and have the right to terminate their employment
- They provide employment contracts with reasonable notice periods for termination
- They do not demand deposits/bonds from employees nor withhold their salaries without just cause
- They do not require employees to surrender their passports or work permits as a condition of employment

Awareness and Training

GN Wellsprings Care Services Ltd has heightened awareness on modern slavery issues by disseminating information across our facilities and through targeted emails to all staff members. This communication emphasises:

- Our commitment to combating modern slavery
- Indicators of potential slavery or human trafficking cases
- The protocol for reporting suspicions of modern slavery

Moreover, we offer training to our employees and suppliers to increase awareness of the risks associated with slavery and forced labour, equipping them with the knowledge and skills needed to identify and address these issues. This includes an e-learning course covering:

The various forms of modern slavery

- The magnitude of the issue and the risks it poses to our organisation
- Recognition of signs of slavery and human trafficking
- Appropriate responses to suspected slavery or human trafficking
- Guidance for suppliers on escalating potential issues within their organisations
- External resources available for victims of slavery
- Instructions for suppliers regarding slavery policies and controls
- Actions GN Wellsprings Care Services Ltd will take if a supplier fails to implement anti-slavery policies or controls
- A declaration from employees committing to abide by our anti-slavery policy

Performance Measurement

We encourage the reporting of any suspected instances of slavery or forced labour, ensuring thorough investigation and appropriate action. Our partnerships and collaborations with other organisations and stakeholders aim to promote best practices and drive positive change in the fight against slavery and forced labour. GN Wellsprings Care Services Ltd has established key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain, including:

- The number of employees who have completed mandatory training
- The number of suppliers who have completed our ethics questionnaire
- The extent to which suppliers have implemented awareness and training programmes comparable to ours
- Employee reports indicating awareness and sensitivity to ethical issues
- Findings from our cross-functional Human Rights team, which evaluates our approach to addressing modern slavery and human trafficking

Final Thoughts

We recognise that the elimination of slavery and forced labour from our business and supply chain is a continuous process. GN Wellsprings Care Services Ltd is committed to constantly improving our policies and procedures to ensure we are doing everything possible to prevent these practices. Our anti-slavery statement reflects our earnest and practical commitment to ethical and responsible business conduct, helping to prevent exploitation and abuse in our supply chains.

This statement pertains to the period from 1 November 2024 and ending 31 October 2025 and has been officially approved by the board of GN Wellsprings Care Services Ltd at a board meeting held on 1 November 2024.

Signed: 

Name: Clare Wanjohi

Position: Director

Date: 01 November 2024