



HADSUL LIMITED

Modern Slavery and Human Trafficking Policy & Procedures

1. Policy Statement.

Hadsul Limited has a zero-tolerance approach to modern slavery and human trafficking in any part of our business or supply chains. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place within our operations or those of our suppliers, umbrella partners, or subcontractors.

2. Purpose

This policy outlines Hadsul Limited's responsibilities and procedures to prevent modern slavery, in accordance with:

The Modern Slavery Act 2015.

Employment Agencies Standards (EAS).

Care Quality Commission (CQC) Regulations.

Ethical principles of fair labour and human rights.

3. Scope

This policy applies to:

All employees and management of Hadsul Limited

Policy Version: 1.0 Approved By: Director, Hadsul Limited. Effective Date: January 2025

Review Date: January, 2026.



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All Workers placed via our agency (including via umbrella companies)

All suppliers, umbrella companies, and third-party partners

4. Our Commitment

We are committed to:

Preventing exploitation and human trafficking.

Improving our practices to combat slavery and forced labour.

Promoting transparency and accountability throughout our recruitment processes and supply chain.

Only working with organisations that share our values and standards.



5. Responsibilities

5.1 Company Director

Approves and reviews this policy annually.

Ensures systems and structures are in place for effective risk management and compliance.

5.2 Recruitment & Compliance Teams.

Carry out due diligence on all candidates and suppliers.

Ensure that modern slavery awareness is integrated into recruitment and onboarding processes.

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Audit umbrella companies and third-party vendors annually.

5.3 Staff and Workers

Must report any suspicions of modern slavery or trafficking immediately.

Complete mandatory modern slavery awareness training.

6. Due Diligence Processes

We take a risk-based approach and implement the following controls:

Candidate Identity Checks: Verify right to work, ID, and proof of address documentation for all workers.

DBS and Reference Checks: To ensure integrity and lawful background.

Supplier Audits: Umbrella companies must provide proof of:

Legal trading status.

Ethical recruitment and payroll practices.

Employment contracts and payment structures.

Contracts: Include anti-slavery clauses in all staff and supplier agreements.

Worker Interviews: Random welfare check-ins for those in long-term placements.

7. Training and Awareness

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All recruitment consultants and compliance staff receive annual training on:

Signs of modern slavery and exploitation.

How to report concerns internally and externally.

New staff are trained as part of their induction.

Posters and internal communications promote awareness and encourage whistleblowing.

8. Reporting and Escalation

Any suspicion of modern slavery must be reported immediately to the Designated Safeguarding Lead (DSL) or Compliance Manager. This includes:

Concerns raised by a Worker, Client, or third party.

Evidence of coercion, control, non-payment, or withholding of documents.

The Compliance Team will escalate to:

The Police (101 or 999 in emergencies)

The Modern Slavery Helpline: 08000 121 700

The GLAA or CQC where applicable.

All concerns are treated in strict confidence and investigated thoroughly.

9. Whistleblowing

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Hadsul operates a whistleblowing policy that encourages all individuals to speak out without fear of retaliation. Staff and Workers can report anonymously to:

manager@extramilehomecareagency.com

+ 4 4 7729902711

10. Monitoring and Review

This policy is reviewed annually or upon significant business changes.

Compliance is monitored through regular internal audits.

Non-compliant suppliers or umbrella companies will be removed from our approved list.

11. Related Policies

Recruitment and Vetting Policy.

Safeguarding Adults Policy.

Whistleblowing Policy.

Equality and Human Rights Policy.

Staff signature:

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