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| <b>Company Name:</b> | Spring Raise Ltd                               |
| <b>Policy No.</b>    | 11                                             |
| <b>Policy Name:</b>  | Modern Slavery and Human Trafficking Statement |
| <b>Date:</b>         | 24/08/2026                                     |

### **Our Policy and Procedure**

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by **Spring Raise** to prevent modern slavery and human trafficking within our business and supply chains. It covers the financial year ending February 2026 and supports our obligations under the **NHS Workforce Alliance Health Workforce Solutions framework**.

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#### **a. Organisation's Structure, Business and Supply Chains**

Spring Raise provides workforce solutions to the health and social care sector, supplying high-quality staff to NHS organisations, local authorities, and independent care providers. We operate across the UK with a core team of permanent employees, supported by a network of temporary and contract staff.

Our supply chain includes:

- Recruitment partners and labour providers.
- Training and compliance service providers.
- Technology and payroll systems.
- Professional services and facilities management suppliers.

We recognise that recruitment supply chains, particularly in healthcare staffing, may present risks of exploitation and therefore require robust governance.

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#### **b. Policies in Relation to Slavery and Human Trafficking**

Spring Raise has a zero-tolerance approach to modern slavery and human trafficking. Our key policies include:

- **Anti-Slavery and Human Trafficking Policy** – setting out expectations for staff and suppliers.
- **Ethical Recruitment Policy** – ensuring fair, transparent, and lawful hiring practices.
- **Whistleblowing Policy** – enabling staff to report concerns confidentially.
- **Equality, Diversity, and Inclusion Policy** – reinforcing fair treatment and respect for all.
- **Supplier Code of Conduct** – requiring compliance with the Modern Slavery Act and NHS Workforce Alliance standards.



### **c. Due Diligence Processes**

We apply strict due diligence processes to mitigate modern slavery risks, including:

- Verification of right-to-work, identity, and employment history for all candidates.
  - Supplier vetting during onboarding, requiring declarations of compliance with the Modern Slavery Act.
  - Regular audits and reviews of suppliers aligned to NHS Workforce Alliance framework expectations.
  - Contractual obligations requiring ethical conduct and legal compliance.
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### **d. Risk Assessment and Management**

We have identified areas of potential risk in:

- Temporary staffing supply chains, where subcontracting can create vulnerabilities.
- Overseas recruitment, where workers may be more at risk of exploitation.
- Lower-skilled roles in healthcare and support services.

To manage these risks, we:

- Only work with suppliers who can evidence compliance with UK labour standards.
  - Require direct employment contracts with fair pay and working conditions.
  - Carry out spot checks and worker feedback sessions to identify concerns.
  - Monitor developments in workforce risk through NHS Workforce Alliance guidance.
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### **e. Effectiveness and Performance Indicators**

We measure the effectiveness of our approach through:

- 100% completion of right-to-work checks.
- Supplier compliance audits completed annually.
- Number of whistleblowing cases raised and resolved.
- Feedback from staff on ethical practices.
- Zero incidents of confirmed modern slavery within our operations or supply chains to date.

We remain committed to continuous improvement, adapting our indicators as best practice evolves.

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### **f. Training and Capacity Building**

We provide training and awareness to all staff involved in recruitment, HR, compliance, and supply chain management. This includes:

- Induction training on the Modern Slavery Act and ethical recruitment.



Spring Raise Ltd

- Annual refresher courses for all compliance and recruitment teams.
- Specialist training for managers on identifying risks and escalating concerns.
- Access to NHS Workforce Alliance resources and updates on best practice.

This ensures our workforce is able to identify, prevent, and address risks of modern slavery effectively.

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## Approval

This statement has been approved by the Board of Directors of Spring Raise and will be reviewed annually.

Signed:

Name: Theresa Mutsvangwa

Position: Managing Director

Date: 24/08/2026