Double Em Services Ltd

*Assurance Beyond Expectations*

# 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 Double EM 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.

Double EM 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 01 March 2025 and ending 28 February 2026.

**Our Business and Supply Chains**

Brief overview:

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

Our services include domiciliary care and supported living for adults. We also operate services connected to children's provision, so our safeguarding arrangements cover both adults and children.

Our governance and accountability are proportionate to the size of our business. Our organisational structure includes:

- Managing Director
- Registered Manager
- Office Co-ordinator
- Human Resources
- IT and Marketing
- Care Co-ordinator (Domiciliary Care)
- Care Co-ordinator (Supported Living)

- Care Co-ordinator (Ofsted)
- Operations and Administration
- Care Support Workers

Overall accountability for this statement sits with the Managing Director. Operational oversight sits with the Registered Manager. Human Resources leads on safer recruitment and worker welfare checks. The Office Co-ordinator supports procurement and supplier management. Care Co-ordinators support safe rostering, supervision, and oversight of day to day delivery.

Our supply chain is relatively small. It typically includes regulated and professional services and suppliers such as training and learning providers, DBS and identity checking services, payroll and finance support, IT systems and telecoms, uniforms and PPE, office suppliers, and property and maintenance providers. Where we use third parties to supply labour, we treat this as a higher risk area and apply enhanced checks. 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. Double EM Services Ltd enforces several policies to detect and prevent slavery and human trafficking in our operations, including:

- Anti Slavery and Human Trafficking approach set out in this statement and embedded in procurement and recruitment processes
- 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.
- Safeguarding policies for adults and children, including escalation and referral processes
- Safer recruitment procedures including right to work checks, DBS, references and employment history checks

Any concern about exploitation, coercion, unsafe working conditions, or indicators of human trafficking can be raised through line management, directly with Human Resources, or directly with the Managing Director or Registered Manager. Concerns are recorded and investigated. Where a concern relates to a person using our services, it is managed alongside safeguarding procedures.

**Supplier Due Diligence**

Double EM 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

If a supplier fails to meet our standards, we require corrective action. We may suspend work, exit a contract, and report concerns to relevant authorities where appropriate.

**Risk Management**

We recognise that modern slavery risk can exist in any sector, including health and social care. The highest risk areas for our business are typically:

- Labour supply chains, including any agency or subcontracted labour
- Recruitment activity, especially where workers are new to the UK labour market or may be financially vulnerable
- Procurement of goods that may be manufactured in higher risk regions, such as uniforms and some PPE
- Outsourced services that can involve low paid labour, such as cleaning, security, transport, or maintenance

We assess risk using a simple risk scoring approach. We consider country and sector risk information, the nature of the service being supplied, the likelihood of vulnerable workers being involved, and any intelligence from trusted sources.

Where risk is higher, we apply enhanced checks, such as additional supplier assurances, evidence requests, and closer monitoring.

We also reduce risk through good workforce practices. We provide clear induction, supervision, and regular contact with staff.

We encourage staff to speak up early, including where they observe concerns in the community that may indicate trafficking or exploitation.

**Our Effectiveness**

We use performance indicators to test whether our controls are working. We track workforce compliance, training completion, and concerns raised. These indicators sit alongside wider quality and safety monitoring. Examples from our internal KPI reporting include:

- DBS compliance: 100% (December 2025)
- Mandatory training compliance: 97% (December 2025), with actions in place to return this to 100%
- Staff turnover: 5.6% annual (December 2025)
- Supervisions completed: 92% (December 2025), with actions in place to increase this to our target

We also monitor modern slavery specific indicators, including completion of modern slavery awareness training for relevant roles, completion of supplier due diligence for new suppliers, and the number and outcomes of any concerns raised through whistleblowing or safeguarding channels.

Where gaps are identified, we implement an improvement plan, assign responsibility, and set deadlines. This ensures modern slavery prevention remains an active part of our governance rather than a one off exercise.

**Awareness and Training**

Double EM 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 Double EM 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

We provide induction and refresher training that supports safe, ethical and lawful practice. Training is tailored to role and includes both care related topics and governance topics. This includes whistleblowing and safer recruitment for managers and staff involved in hiring.

Our training matrix includes, among other topics, safeguarding adults, safeguarding children, Prevent, equality and diversity, GDPR and confidentiality, duty of candour, professional boundaries, safer recruitment, and whistleblowing. We also provide modern slavery awareness training for managers and staff involved in recruitment and procurement.

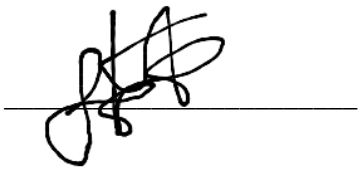
Training completion is monitored. Competency checks are completed where required, for example medication competency observations and moving and handling practical

assessments. Supervisions take place regularly and include wellbeing checks and opportunities for staff to raise concerns.

**Final Thoughts**

We recognise that the elimination of slavery and forced labour from our business and supply chain is a continuous process. Double EM 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 01 March 2025 and ending 28 February 2026 and has been officially approved by the board of Double EM Services Ltd at a board meeting held on 01 March 2025.



Name: **John Bawak**
Position: **Director**
Date: **01 March 2025**