



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FINANCIAL YEAR ENDED 31 MARCH 2026

Voluntary transparency statement for a small healthcare staffing and unregulated support organisation

REPORTING PERIOD 11 Nov 2024 to 31 Mar 2026	LEGAL STATUS Voluntary publication	NEXT REVIEW By 30 Sep 2027
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Legal entity	Heartbeat Healthcare Ltd Company No. 16072594
Registered office	2 Battle Place, Reading, England, RG30 1AJ
Reporting period	11 November 2024 to 31 March 2026
Document control	HBH-MSA-001 Version 1.0
Approval	Board approved 20 June 2026
Signed by	Shadreck Chawira, Director
Publication status	Current statement for publication on the company website

OUR COMMITMENT	We will not tolerate slavery, servitude, forced or compulsory labour, human trafficking, debt bondage, deceptive recruitment, unlawful recruitment fees or any other form of exploitation in our organisation or supply chains. We will recruit ethically, listen to workers, act on warning signs and place the safety and interests of potential victims first.
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Approved by Shadreck Chawira, Director | 20 June 2026

1 Document control and approval

Document title	Modern Slavery and Human Trafficking Statement
Document reference	HBH-MSA-001
Statement owner	Shadreck Chawira, Director
Supporting Director	Nyararayi Fleur Chimwadzimba
Board approval	20 June 2026
Reporting period	11 November 2024 to 31 March 2026
Current reporting status	Voluntary statement. Heartbeat Healthcare Ltd is below the £36 million annual turnover threshold for mandatory reporting under section 54 of the Modern Slavery Act 2015.
Review cycle	Annual, within six months of each financial year end where practicable, or sooner following a material change, substantiated concern, major supplier issue, legal change or expansion of international recruitment.
Next planned publication	No later than 30 September 2027 for the financial year ending 31 March 2027.
Controlled copy	The approved electronic master is the controlled copy. Printed and downloaded copies are uncontrolled unless specifically issued and recorded.

1.1 Statement basis and transparency note

This is Heartbeat Healthcare Ltd's first modern slavery and human trafficking statement. The company was incorporated on 11 November 2024 and its first accounting period ends on 31 March 2026. Because the business is newly established, this statement distinguishes between actions completed during the reporting period, controls formalised by the approval date, and commitments for the next reporting year. We do not imply that every control described operated throughout the entire reporting period.

Although Heartbeat Healthcare Ltd is not legally required to publish a statement because it is below the statutory turnover threshold, the Board has chosen to publish voluntarily. We consider this appropriate because we operate in healthcare recruitment, temporary staffing and support services, where workers may be vulnerable to recruitment debt, deceptive job offers, immigration-related dependency, underpayment, document retention, coercive working arrangements or exploitation by labour intermediaries.

PLAIN-ENGLISH POSITION

Plain-English position

We are a small company, but small size does not remove responsibility. Our approach is to be honest about current maturity, put practical controls in place, and improve the quality of evidence year by year.

1.2 Version history

Version	Date	Owner	Summary	Approval
1.0	20 June 2026	Shadreck Chawira, Director	First comprehensive statement. Establishes the company's risk assessment, ethical recruitment commitments, due diligence controls, reporting routes, performance measures and 2026/27 action plan.	Approved

1.3 Related internal documents and systems

- Quality Management, Assurance and Continuous Improvement Policy
- Equality, Diversity and Human Rights Policy
- Environmental Policy and Carbon Reduction Plan
- Safer recruitment, selection and pre-employment checking procedures
- Safeguarding adults and children procedures
- Whistleblowing, freedom to speak up, grievance and complaints arrangements
- Incident, accident, near-miss and escalation procedures
- Health and safety, lone working and business continuity arrangements
- Data protection, confidentiality and records management arrangements
- Worker contracts, assignment information and payroll controls
- Supplier approval, procurement and contract management records
- Birdie care management software for authorised support records, notes, alerts and audit trails.

2 Board and Director's statement

Approved and signed by

Shadreck Chawira

Director, Heartbeat Healthcare Ltd

Date: 20 June 2026



Signature

Heartbeat Healthcare Ltd is committed to respecting human rights and protecting workers, candidates, people receiving support and others who may be affected by our activities. We recognise modern slavery as a serious crime and an extreme abuse of power. It is incompatible with our values, our duty to act responsibly and the trust placed in healthcare and social care organisations.

Our Board of Directors, comprising Shadreck Chawira and Nyararayi Fleur Chimwadzimba, has approved this statement. Shadreck Chawira has executive ownership of implementation and reporting. Both Directors are responsible for setting the tone, allocating proportionate resources, challenging risks, reviewing serious concerns and ensuring that commercial pressure never justifies exploitative or unsafe practice.

We will not knowingly enter into or continue a relationship with any worker, recruiter, labour provider, supplier, contractor or client that uses forced labour, human trafficking, child labour, unlawful recruitment fees, coercive deductions, document retention, intimidation or other serious exploitation. Where a concern is identified, our priority will be immediate safety, careful assessment, protection from retaliation, appropriate referral and remedy. We will avoid abrupt action that could make a potential victim less safe or remove their income without support.

We also recognise that a statement is only useful if it describes real action. Our first reporting cycle focuses on establishing reliable recruitment controls, worker voice, supplier due diligence, risk assessment, training and transparent performance measures. Future statements will report evidence, gaps, incidents, remediation and progress against the commitments set out here.

BOARD COMMITMENT

Board commitment

No worker should have to pay for a job, surrender identity documents, accept unlawful deductions, work under threat, or remain in employment because of debt, immigration pressure, accommodation dependency or fear of retaliation.

3 Executive summary

Heartbeat Healthcare Ltd is a small UK healthcare staffing and support organisation. Its activities include employment placement, temporary employment agency services, recruitment and compliance management, and agreed forms of

unregulated home and community support. The company is not currently registered with the Care Quality Commission and must not provide regulated activity in its own right unless and until the appropriate registration is granted.

Our most significant inherent modern slavery risks arise from labour recruitment and employment rather than from a large goods supply chain. These include the possibility that a worker has paid excessive or hidden recruitment fees, incurred debt to secure work, received misleading information about pay or hours, had identity documents controlled, become dependent on a sponsor or intermediary, experienced threats linked to immigration status, suffered unlawful deductions, or been pressured to accept excessive work. Risks may be greater when recruitment involves overseas candidates, multiple intermediaries, subcontracting or accommodation and transport linked to employment.

Our approach is based on prevention, detection, response and continual improvement. We use direct Board accountability, safer recruitment, right-to-work and identity checks, written terms, no worker-paid job-finding fees, transparent pay, worker welfare contact, grievance and whistleblowing routes, supplier screening, risk-based due diligence, training, incident escalation and management review. We will use Birdie to support accurate records and escalation within direct support services, while retaining separate confidential routes for employment concerns and whistleblowing.

Priority	What we will do	How we will evidence it
Ethical recruitment	Prohibit worker-paid recruitment fees, deceptive offers, passport retention and coercive deductions.	Candidate declarations, recruiter checks, contracts, interview records and welfare calls.
Worker protection	Provide clear terms, lawful pay, freedom to raise concerns and protection from retaliation.	Contracts, payslips, time records, grievance logs, supervision and anonymous feedback.
Risk-based due diligence	Assess labour providers and higher-risk suppliers before engagement and during delivery.	Supplier questionnaires, approvals, contract clauses, audits and corrective actions.
Early identification	Train staff to recognise indicators in the workforce, supply chain and people's homes.	Induction records, refresher completion, safeguarding records and escalation logs.
Victim-centred response	Prioritise safety and remediation, cooperate with authorities and avoid harmful knee-jerk termination.	Incident records, risk assessments, referrals, action plans and Board review.
Measurable improvement	Set realistic targets, review trends and publish progress annually.	KPI dashboard, governance minutes, annual risk review and updated statement.

4 Scope, reporting period and publication status

4.1 Organisational scope

This statement applies to Heartbeat Healthcare Ltd and to all activities carried out by its Directors, employees, temporary workers, agency workers, contractors, consultants, recruiters and representatives. It also sets expectations for suppliers, labour providers, subcontractors, client-facing partners and other organisations acting on our behalf.

The statement covers our own operations and the supply chains over which we can reasonably exercise influence. It does not claim direct control over every lower-tier supplier. Where visibility is limited, we will use contractual requirements, targeted enquiries, evidence requests, worker feedback and escalation to improve assurance.

4.2 Reporting period

The reporting period is from incorporation on 11 November 2024 to the end of the company's first financial year on 31 March 2026. Controls and commitments described as current are those in place or formally approved by 20 June 2026. Actions listed for 2026/27 are forward commitments and will be assessed in the next statement.

4.3 Voluntary status

Section 54 of the Modern Slavery Act 2015 requires commercial organisations carrying on business in the UK, supplying goods or services and having annual turnover of £36 million or more to publish an annual statement. Heartbeat Healthcare Ltd is below that threshold. We are publishing voluntarily because our sector and business model involve labour supply and because commissioners and clients reasonably expect evidence that modern slavery risks are being addressed.

4.4 Publication and accessibility

The approved statement will be published on our website and made available to workers, candidates, clients, commissioners, suppliers and members of the public. We will provide an accessible version or reasonable communication support when requested. A prominent website link will be maintained to the current statement, and superseded statements will be retained for transparency where practical.

5 About Heartbeat Healthcare Ltd

5.1 Structure and leadership

Heartbeat Healthcare Ltd is an active private limited company registered in England and Wales under company number 16072594. Its registered office is 2 Battle Place, Reading, England, RG30 1AJ. The company was incorporated on 11 November 2024. Its Directors are Shadreck Chawira and Nyararayi Fleur Chimwadzimba.

5.2 Business activities

The company's business model includes healthcare and social care recruitment, permanent placement activity, temporary staffing, compliance management and agreed unregulated support in people's homes or communities. Current unregulated support may include companionship, social support, shopping, light household assistance, help with correspondence and community access, provided that the activity does not amount to regulated personal care or another regulated activity.

When supplying a worker to a separate client organisation, the client retains responsibility for local induction, assignment management, day-to-day site supervision and clinical governance within its registered or regulated service. Heartbeat Healthcare remains responsible for the accuracy of worker information, lawful recruitment, pre-deployment checks, appropriate matching, employment or engagement arrangements, payroll responsibilities within its control, and action on concerns reported to us.

5.3 Workforce and operating model

As a growing organisation, Heartbeat Healthcare operates with a small leadership structure and may combine operational roles. Combining roles does not remove accountability. Key decisions, recruitment clearances, exceptions, supplier approvals, risk assessments and serious concerns must be recorded and subject to Director oversight.

Workers may include directly employed staff, temporary workers, agency workers, contractors or professionals supplied to client organisations. Modern slavery controls apply regardless of employment status, nationality, immigration status, length of assignment, working pattern or route of recruitment.

5.4 Supply chain profile

Our direct supply chain is expected to be relatively short compared with a large multinational organisation. It may include recruitment platforms, labour or recruitment partners, payroll and professional services, training providers, DBS and compliance services, insurers, software and cloud providers, uniforms, personal protective equipment, office supplies, electronic equipment, telecommunications, transport, cleaning products, waste services and other business support.

The greatest risk is not determined solely by spend. A low-value labour service or recruitment introduction can present greater exploitation risk than a high-value software contract. We therefore prioritise due diligence according to the nature of the labour, country, intermediary, workforce vulnerability, recruitment model and ability to obtain reliable evidence.

6 What we mean by modern slavery and exploitation

Modern slavery is an umbrella term for severe exploitation that a person cannot freely refuse or leave because of threats, violence, coercion, deception, abuse of vulnerability or abuse of power. It includes slavery, servitude, forced or compulsory labour and human trafficking. It can also involve debt bondage, domestic servitude, child exploitation, criminal exploitation and labour exploitation linked to recruitment or migration.

Term	Meaning in our context
Forced or compulsory labour	Work or services extracted under threat, coercion, punishment, intimidation, debt, immigration pressure or other circumstances that remove genuine choice.

Term	Meaning in our context
Human trafficking	Recruitment, transport, transfer, harbouring or receipt of people for exploitation, including where movement occurs within the UK.
Debt bondage	A worker becomes trapped by recruitment debt, inflated travel or accommodation charges, loans, deposits or deductions that they cannot realistically repay.
Deceptive recruitment	Material differences between what was promised and the reality of the job, such as pay, hours, location, duties, accommodation, visa arrangements or fees.
Document retention	A recruiter, employer, landlord or intermediary controls a worker's passport, biometric card, bank card or other personal document and restricts access.
Coercive dependency	A worker is made dependent on the same person or business for work, immigration status, accommodation, transport, debt or access to wages, and fears consequences for leaving.
Child labour and exploitation	Work or activity involving a child that is unlawful, harmful, coercive or interferes with their safety, development or education.
Labour abuse continuum	Poor practice such as unlawful deductions, wage underpayment, excessive hours or threats may escalate into severe exploitation. We act early rather than waiting for certainty that a criminal offence has occurred.

Modern slavery is often hidden and may appear alongside apparently ordinary employment. A worker may be reluctant to disclose abuse because of fear, shame, family pressure, debt, language barriers, threats to immigration status, distrust of authorities or concern that they will lose income or accommodation. Staff must therefore listen carefully, avoid judgement and escalate concerns without confronting a suspected exploiter.

7 Legal and good-practice framework

Our approach is informed by the following legislation and guidance. The exact application depends on the activity, employment relationship and circumstances. This list is not exhaustive and will be reviewed as the legal and regulatory framework develops.

Requirement or reference	Application to our approach
Modern Slavery Act 2015	Defines principal modern slavery offences and establishes the transparency in supply chains reporting framework.
Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015	Sets the £36 million turnover threshold for mandatory section 54 reporting.
Employment Agencies Act 1973 and Conduct of Employment Agencies and Employment Businesses Regulations 2003	Set important requirements for employment agencies and employment businesses, including protections for work-seekers and information requirements.
National Minimum Wage Act 1998 and associated regulations	Require workers to receive at least the applicable statutory minimum, subject to lawful rules and deductions.
Working Time Regulations 1998	Protect working time, rest and holiday entitlements, which can be relevant to fatigue, coercive availability and excessive hours.
Agency Workers Regulations 2010	Provide specified rights for agency workers, including equal treatment rights after the qualifying period.
Immigration, Asylum and Nationality Act 2006 and right-to-work requirements	Require lawful checks without permitting discrimination, intimidation or improper retention of original documents.
Care Act 2014 and safeguarding guidance	Inform the recognition and referral of adult safeguarding concerns, including exploitation and modern slavery.
Children Act 1989 and 2004 safeguarding duties	Inform urgent protection and referral where a child may be exploited or trafficked.
Equality Act 2010 and Human Rights Act 1998	Support fair treatment, dignity, non-discrimination, privacy and protection from degrading treatment.
Public Interest Disclosure Act 1998	Supports protection for qualifying whistleblowing disclosures.

Requirement or reference	Application to our approach
UK GDPR and Data Protection Act 2018	Require lawful, secure and proportionate use of personal information during recruitment, monitoring and investigations.
Procurement Act 2023 and PPN 009	Inform public procurement expectations on modern slavery risk, exclusions, due diligence, contract management and remediation.
DHSC Code of Practice for International Recruitment of Health and Social Care Personnel	Sets ethical recruitment expectations where international health or social care recruitment is undertaken.

7.1 Current government reporting expectations

Current Home Office guidance recommends that statements address six core areas: organisational structure and supply chains; policies; due diligence; risk assessment and management; measures of effectiveness; and training. Our statement follows those areas and adds worker voice, remediation, governance and a time-bound action plan because these are particularly important in labour supply and healthcare recruitment.

7.2 External references

- **Home Office, Transparency in supply chains: a practical guide.** <https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide-accessible> (accessed 20 June 2026).
- **GOV.UK, Publish an annual modern slavery statement.** <https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement> (accessed 20 June 2026).
- **Modern Slavery Act 2015, section 54.** <https://www.legislation.gov.uk/ukpga/2015/30/section/54> (accessed 20 June 2026).
- **Cabinet Office, PPN 009: Tackling modern slavery in government supply chains.** <https://www.gov.uk/government/publications/ppn-009-tackling-modern-slavery-in-government-supply-chains> (accessed 20 June 2026).
- **Department of Health and Social Care, Code of practice for international recruitment.** <https://www.gov.uk/government/publications/code-of-practice-for-the-international-recruitment-of-health-and-social-care-personnel> (accessed 20 June 2026).
- **GOV.UK, Agency workers: fees.** <https://www.gov.uk/agency-workers-your-rights/fees> (accessed 20 June 2026).

8 Governance, accountability and oversight

Role	Key responsibilities
Board of Directors	Approve the statement and risk appetite; ensure adequate resources; review significant risks, allegations, remediation and public claims; challenge performance and approve the annual action plan.
Shadreck Chawira, Director and statement owner	Own implementation; chair governance review; approve higher-risk recruiters and suppliers; oversee serious concerns, external reporting, remediation and annual disclosure.
Nyararayi Fleur Chimwadzimba, Director	Support Board challenge and oversight; review workforce welfare, equality and organisational learning; act as an alternative escalation route where a concern involves the statement owner or normal management line.
Quality or compliance lead, where delegated	Maintain the risk register, supplier due diligence records, training evidence, concerns log, KPI dashboard and action plan; report overdue or high-risk matters.
Recruitment and compliance staff	Apply ethical recruitment standards, verify documents without retaining them improperly, identify fee or debt concerns, complete declarations and stop deployment when evidence is missing or concerning.
Payroll, scheduling and operational staff	Maintain accurate pay and time information, identify excessive hours or coercive availability, monitor unusual payment requests, respond to welfare indicators and escalate concerns.
Workers and representatives	Follow this statement and related procedures, report suspicions promptly, cooperate with training and due diligence, and never intimidate or retaliate against a person who raises a concern.

Role	Key responsibilities
Suppliers, labour providers and recruiters	Meet contractual standards, prohibit exploitation and worker-paid job-finding fees, provide evidence, disclose concerns, cooperate with review and take corrective action.

8.1 Governance cycle

- Operational concerns are reviewed immediately or at the next working opportunity according to risk.
- Workforce welfare, recruitment exceptions, supplier concerns and KPI trends are reviewed at least quarterly while services are active.
- The modern slavery risk assessment and action plan are reviewed at least annually.
- A serious allegation, credible whistleblowing disclosure, major supplier breach, new international recruitment route or material business change triggers an out-of-cycle review.
- The Board approves each annual statement and records the approval in meeting minutes or a written Board resolution.

8.2 No commercial override

A vacancy, urgent shift, client deadline, recruitment target or financial opportunity does not justify bypassing worker checks, accepting unexplained fees, ignoring welfare indicators or continuing with a labour provider that will not provide satisfactory assurance. A decision to pause, decline or terminate a relationship must be recorded, proportionate and designed to avoid additional harm to workers.

9 Policies and standards that support this statement

Modern slavery prevention is embedded across our governance framework rather than treated as a standalone annual publication. The following policy areas support prevention and response:

Policy area	Contribution to modern slavery prevention
Quality management and assurance	Requires clear responsibilities, lawful scope, audits, risk management, corrective action, management review and evidence-based improvement.
Equality, diversity and human rights	Prohibits discrimination, harassment and victimisation; promotes dignity, fair access, reasonable adjustments and protection of human rights.
Safer recruitment and pre-employment checks	Requires identity, right-to-work, employment history, references, DBS checks where eligible, qualification checks, role suitability and final clearance before deployment.
Whistleblowing and freedom to speak up	Provides routes to report unsafe, unlawful or exploitative practice and prohibits retaliation.
Safeguarding	Requires immediate action when an adult or child may be experiencing abuse, neglect, trafficking or exploitation.
Grievance, complaints and disciplinary arrangements	Provide fair routes to raise concerns and consequences for misconduct, intimidation, exploitation or deliberate concealment.
Payroll, working time and worker records	Support lawful pay, transparent deductions, accurate hours, rest and auditable payments.
Procurement and supplier approval	Require risk-based checks, evidence, contractual expectations, review and corrective action for higher-risk suppliers.
Data protection and confidentiality	Protect personal information while allowing necessary information sharing for safeguarding, legal reporting and victim protection.
Business continuity and incident management	Support prompt escalation, preservation of evidence, safe service continuity and learning from significant events.

Policies and procedures will be reviewed when concerns, legal developments, audits, worker feedback or business changes show that controls need to be strengthened. Staff will be directed to the current approved versions and obsolete documents will be removed from active use.

10 Risk assessment methodology

We use a proportionate, risk-based approach. The purpose is not to label individuals or nationalities as risky. It is to identify business models, recruitment routes, working arrangements and supply chains that can create or conceal exploitation.

10.1 Risk factors considered

- Use of labour intermediaries, sub-agents or long recruitment chains.
- International recruitment, visa dependency, sponsorship relationships or limited knowledge of UK rights.
- Reports of worker-paid fees, loans, deposits, travel debts, accommodation charges or unexplained deductions.
- Recruitment from countries or sectors associated with elevated labour exploitation risk.
- Low-paid, temporary, isolated, night, live-in, migrant or otherwise vulnerable work.
- Worker accommodation or transport controlled by an employer, recruiter or connected person.
- Cash payments, third-party bank accounts, inconsistent timesheets or unusually high deductions.
- Limited supplier transparency, refusal to disclose sub-contractors or inability to evidence worker standards.
- Rapid mobilisation, severe labour shortages or commercial pressure that could weaken normal checks.
- Goods with complex global supply chains, including some uniforms, PPE, electronics and consumables.
- Concerns raised by workers, families, clients, professionals, auditors, regulators or public sources.

10.2 Risk scoring

Rating	Description	Required response
Low	Limited indicators, simple and transparent supply chain, direct control and satisfactory evidence.	Standard approval and periodic review.
Moderate	Some vulnerability, use of intermediaries, limited transparency or a sector/country risk requiring additional assurance.	Enhanced questions, evidence checks, contractual controls and scheduled review.
High	Multiple risk factors, credible allegations, unexplained fees or deductions, document control, coercion indicators, opaque subcontracting or refusal to cooperate.	Do not proceed or pause activity unless the Director approves a documented safeguarding and remediation plan. Consider external referral.
Critical	Immediate danger, suspected trafficking, forced labour, child exploitation, threats, violence or severe restriction of freedom.	Protect safety, call 999 where required, follow safeguarding and law-enforcement routes, preserve evidence and obtain specialist support.

Risk ratings are not static. They are reviewed when there is a new supplier, new country, new recruitment partner, change in workforce, complaint, adverse media, audit finding, contract variation, welfare concern or material change in immigration or labour market conditions.

11 Our modern slavery risk profile

Risk area	Why it matters	Inherent risk	Main controls
Recruitment fees and debt	Candidates may pay an intermediary for job-finding services, visas, training, travel or introductions, leaving them indebted and vulnerable.	Moderate to high	No job-finding fees; candidate declarations; direct questioning; recruiter contracts; welfare checks; escalation of unexplained debt.
International recruitment and immigration dependency	Workers may fear job loss, sponsorship consequences or removal from the UK, and may not understand their rights.	Moderate to high where applicable	Ethical recruitment code; clear terms; no threats; independent support routes; alternative escalation; checks on recruiters and fees.
Temporary and agency labour	Short assignments and multiple parties can obscure accountability, pay, hours or welfare concerns.	Moderate	Clear responsibilities, assignment information, time and pay records, client feedback, worker contact and no clearance/no deployment.
Document retention or identity control	Original documents may be retained by a recruiter, landlord or connected person as a method of control.	Moderate	Inspect and return originals promptly; use secure copies; ask workers privately; prohibit third-party retention.

Risk area	Why it matters	Inherent risk	Main controls
Pay, deductions and working hours	Underpayment, unlawful deductions, unpaid travel, falsified hours or pressure to accept excessive shifts can indicate exploitation.	Moderate	Transparent rates, payslips, auditable timesheets, working-time monitoring, deduction review and worker queries.
Accommodation and transport dependency	Workers may rely on a recruiter or employer-linked landlord or transport provider and fear homelessness or loss of mobility.	Moderate where used	Do not make accommodation a condition unless lawful and transparent; separate agreements; fair charges; freedom to choose; welfare checks.
Subcontractors and recruitment partners	Lower-tier providers may use sub-agents or practices not visible to Heartbeat Healthcare.	Moderate to high	Prior approval, disclosure of sub-agents, contract clauses, evidence, worker interviews and right to audit or terminate responsibly.
Uniforms, PPE, electronics and consumables	Some goods may originate in complex global supply chains with forced labour risk.	Low to moderate	Use reputable suppliers, risk-based questions, certifications where meaningful, avoid unsupported claims and review higher-risk products.
People encountered during support	Staff may observe signs that a person in the community or household is being controlled or exploited.	Moderate consequence	Safeguarding training, Birdie records where appropriate, immediate escalation, no confrontation and referral to responsible authorities.
Rapid growth and mobilisation	Growth can create pressure to recruit quickly or accept weak evidence.	Moderate	Director approval, resourcing review, controlled mobilisation, audit and refusal to bypass checks.

RISK CONCLUSION

Risk conclusion

Our highest inherent risk is labour recruitment, particularly where overseas candidates or third-party intermediaries are involved. Our controls therefore focus first on recruitment fees, debt, contracts, documents, pay, worker voice and intermediary transparency.

12 Ethical recruitment and worker protection

12.1 No worker-paid job-finding fees

Heartbeat Healthcare will not charge a work-seeker a fee for finding or trying to find work. We will not knowingly use a recruiter or sub-agent that charges such a fee. Candidates will be told that they should not pay for a job offer, interview, Certificate of Sponsorship, placement or introduction. Legitimate personal costs, where lawful, must be clearly distinguished from job-finding fees and must never be hidden, inflated or used to create dependency.

Where a candidate discloses that they paid a fee or borrowed money to secure work, the matter will be assessed privately and without blaming the candidate. We will seek details of who charged the fee, what was promised, whether threats or debt are involved, and whether other workers may be affected. Engagement with the recruiter may be paused while the risk is assessed. Remediation may include support to recover fees, referral, contract action and protection from retaliation.

12.2 Accurate and transparent job information

- Job titles, duties, location, status, pay, deductions, hours, working patterns and assignment duration will be stated accurately.
- Candidates will not be promised guaranteed hours, immigration outcomes, accommodation, earnings or progression that Heartbeat Healthcare cannot deliver.
- Any conditional offer will clearly state the conditions and the consequences if they are not met.
- Material changes will be explained before the worker is expected to accept them.
- Candidates will receive an opportunity to ask questions and obtain clarification before signing.

12.3 Identity and right-to-work documents

Original identity and right-to-work documents may be inspected only for lawful verification. They will be returned promptly and will not be retained as security or to restrict movement. Copies will be stored securely, access will be limited and records will be retained only as required by law and our retention schedule. Staff will not send original documents to an unauthorised third party.

12.4 Contracts, freedom and deductions

- Written terms will be provided in language that is clear and proportionate to the role.
- Workers will be free to resign or end an assignment in accordance with lawful contractual terms.
- Deductions will be lawful, transparent, itemised and agreed where consent is required.
- Heartbeat Healthcare will not impose deposits, exit penalties, unlawful repayment clauses or unreasonable restrictions designed to trap a worker.
- Wages will normally be paid into an account controlled by the worker. Requests to pay a third party will be questioned and documented.
- Workers will receive payslips and a route to query pay, hours and deductions without retaliation.

12.5 No clearance, no deployment

A worker will not be deployed where mandatory identity, right-to-work, reference, role, training, DBS or professional checks are missing, expired, unsatisfactory or unresolved. Commercial urgency is not a reason to bypass compliance. Equally, checks must be applied fairly and must not be used to intimidate workers or discriminate against people because of nationality or immigration status.

13 International recruitment and immigration-related safeguards

Where Heartbeat Healthcare undertakes international recruitment, directly or through another organisation, we will follow the Department of Health and Social Care Code of Practice for the International Recruitment of Health and Social Care Personnel and use the current Ethical Recruiters List where applicable. We will not actively recruit from countries on the current red list and will observe restrictions applying to amber-list countries.

13.1 International recruitment controls

- Use only approved recruitment organisations and disclose any sub-agents before activity begins.
- Prohibit job-finding fees, deposits, passport retention and misleading claims about visas, pay or guaranteed hours.
- Provide accurate written information before travel or significant expenditure is incurred.
- Check whether candidates have incurred debt and whether fees were paid to any person in the recruitment chain.
- Ensure international workers receive the same core employment rights and fair treatment as comparable domestically recruited workers.
- Provide proportionate induction, pastoral support, information about UK employment rights and routes to independent help.
- Avoid threats or pressure linked to immigration status and never use sponsorship as a tool of coercion.
- Escalate any concern that a worker is being controlled by a recruiter, sponsor, landlord, family member or other intermediary.

13.2 Sponsorship and dependency

If Heartbeat Healthcare holds or later obtains a sponsor licence, compliance with immigration rules will be managed separately from worker welfare. Sponsorship responsibilities do not permit coercion, retaliation or threats. A worker who raises a concern will not be threatened with reporting, dismissal or loss of immigration status. Where employment may end, communications will be accurate, respectful and consistent with legal duties. The company will consider signposting to independent advice and relevant regional support where a sponsored care worker becomes displaced or vulnerable.

13.3 Accommodation and relocation

Any assistance with accommodation, travel or relocation must be transparent and optional unless objectively required and lawful. Charges must be clear, reasonable and documented. Accommodation must not be used to control a worker, restrict visitors, retain documents, impose curfews unrelated to tenancy, or create an unreasonable barrier to leaving employment. Workers will be told who owns or manages accommodation and what happens if employment ends.

14 Temporary staffing, agency work and client responsibilities

Temporary staffing involves multiple parties and can create gaps in responsibility. Heartbeat Healthcare will define the respective responsibilities of the company, worker and client organisation in contracts and assignment information. We will not assume that a client's governance replaces our own recruitment and worker welfare duties.

14.1 Our controls

- Confirm the identity of the hirer, assignment location, duties, required skills, pay information, hours, health and safety arrangements and reporting lines.
- Provide the worker with accurate assignment information before attendance.
- Maintain auditable records of hours, cancellations, pay queries and material assignment changes.
- Monitor repeated excessive hours, unusual shift patterns, double booking, unexplained third-party instructions or worker reluctance to speak privately.
- Provide a direct route for workers to contact Heartbeat Healthcare about pay, conduct, safety or exploitation concerns.
- Act on client concerns about a worker while ensuring a fair, evidence-based process and avoiding retaliation against a worker who has raised a concern.
- Require clients to cooperate with safeguarding or modern slavery enquiries where relevant and lawful.

14.2 Client due diligence

Before entering a material staffing relationship, we may consider the client's identity, regulatory status where relevant, payment practices, site conditions, use of subcontracting, previous concerns, safeguarding arrangements and willingness to support worker welfare. A client request to pay a worker through an inappropriate route, conceal hours, retain documents, impose unlawful deductions or prevent private contact with the worker will be treated as a serious concern.

15 Supplier and labour-provider due diligence

Due diligence is proportionate to risk and begins before engagement. It continues through contract delivery and is not satisfied by collecting a policy that is never reviewed. Higher-risk labour providers must demonstrate how workers are recruited, paid, informed, supported and able to raise concerns.

15.1 Pre-engagement checks

- Verify the legal identity, ownership, address and relevant licences, registrations or accreditations.
- Understand the service, countries, workforce model, subcontracting and use of recruitment agents.
- Ask whether workers pay any fees, deposits or charges and obtain a clear written explanation.
- Review modern slavery, ethical recruitment, whistleblowing and worker welfare arrangements where proportionate.
- Check adverse information, enforcement action, credible complaints or inconsistent representations.
- Assess whether pay, timesheets, deductions, accommodation and document handling are transparent.
- Require disclosure and prior approval of labour sub-agents or material subcontractors.
- Assign a risk rating, approval decision, review date and action owner.

15.2 Contract expectations

- Compliance with applicable modern slavery, employment, human rights and recruitment laws.
- No forced labour, trafficking, child labour, worker-paid job-finding fees, passport retention or coercive deductions.
- Accurate records and prompt disclosure of suspected or confirmed exploitation.
- Cooperation with proportionate audits, worker interviews, investigations and remediation.
- Flow-down of equivalent standards to approved subcontractors and sub-agents.
- Protection from retaliation for workers who raise concerns.
- Rights to suspend, require corrective action or terminate responsibly where serious non-compliance is not remedied.

15.3 Ongoing monitoring

Monitoring may include document review, performance meetings, worker feedback, payroll or timesheet sampling, training evidence, site or remote audits, action-plan follow-up and review of credible external information. The depth of monitoring will reflect risk and our practical ability to influence the relationship.

15.4 Responsible disengagement

Immediate termination may sometimes increase harm by removing income, accommodation or access to support. Where safe and lawful, we will work with the supplier to protect workers, stop the abusive practice, repay fees or wages, correct records and prevent recurrence. We will disengage where the supplier refuses to cooperate, conceals exploitation, retaliates, presents ongoing serious risk or cannot provide credible remediation.

16 Purchasing and goods supply chains

Our goods supply chain is currently modest, but some products may have complex international sourcing. We will prioritise reputable suppliers and avoid making unsupported claims that a product is slavery-free. Where risk is higher, we will ask about source countries, manufacturing, labour standards, certifications, audit findings and corrective action.

Category	Potential risk	Proportionate control
Uniforms and textiles	Cotton, garment manufacture, subcontracting and low-wage production can involve forced labour.	Use established suppliers, request sourcing information for material purchases, consider credible standards and investigate adverse information.
PPE and medical consumables	Complex global manufacturing and emergency purchasing can reduce transparency.	Avoid unnecessary spot purchasing, use reputable distributors, ask for supply-chain assurance for higher-volume or higher-risk products.
Electronics and IT equipment	Mineral extraction and component assembly may involve labour rights risks.	Purchase from established suppliers, extend product life, consider supplier human-rights disclosures and responsible procurement criteria.
Cleaning and office supplies	Lower spend but possible manufacturing and logistics risks.	Use approved suppliers, consolidate purchasing and apply standard supplier expectations.
Professional and digital services	Risk is generally lower but may include outsourced or offshore labour.	Confirm legal entity, data processing, subcontracting and employment standards where material.

17 Worker voice, welfare and freedom to speak up

Workers are often best placed to identify recruitment abuse, hidden fees, coercive management or poor conditions. A system that only checks documents will miss concerns. We will create opportunities for workers to speak privately and will not rely solely on information provided by a recruiter or line manager.

17.1 Worker communication

- Explain in induction that modern slavery, recruitment fees, document retention and retaliation are prohibited.
- Provide named management contacts and an alternative Director route.
- Allow concerns by telephone, email, in writing, through supervision or anonymously where practicable.
- Offer reasonable communication support, interpretation or advocacy where needed.
- Make clear that reporting a concern will not affect fair access to work or lead to punishment.
- Ask new and internationally recruited workers privately about fees, debt, documents, accommodation, pay and whether the reality matches the offer.
- Use exit feedback to identify patterns that may not have been raised during employment.

17.2 Welfare checks

Risk-based welfare checks will be completed after recruitment and during active work. Questions will be open, non-judgemental and asked away from a recruiter, landlord, family member or other person who may exert control. A worker is not required to use the term modern slavery. Statements such as “I owe someone for this job”, “my passport is kept for me”, “I cannot refuse shifts”, “my wages go to another person” or “I will be reported if I leave” must be taken seriously.

17.3 Non-retaliation

Retaliation, intimidation, loss of shifts, threats, discriminatory treatment or adverse references because a person raised a genuine concern are prohibited. Alleged retaliation will be investigated as a separate serious matter. Confidentiality will be

protected as far as possible, but no promise of absolute secrecy will be made where information must be shared to protect someone or meet a legal duty.

18 Identifying indicators and reporting concerns

18.1 Possible indicators

Indicator area	Examples
Recruitment and debt	A person paid a recruiter, owes money for the job, has unexplained loans, or fears a person who arranged the work.
Documents and movement	Someone else controls their passport, bank card, phone or travel; they cannot leave accommodation or travel independently.
Pay and hours	Wages are withheld, paid to another person, below expectations, subject to unexplained deductions, or the person works excessive hours without genuine choice.
Control and communication	The person is accompanied, coached, not allowed to speak alone, appears fearful, avoids eye contact or gives inconsistent answers that may reflect pressure.
Living conditions	Overcrowded or employer-controlled accommodation, restricted access, surveillance, threats of eviction or excessive rent deductions.
Threats and immigration	Threats of police, immigration enforcement, dismissal, deportation, harm to family or blacklisting if the person complains or leaves.
Health and behaviour	Untreated injuries, exhaustion, malnutrition, anxiety, withdrawal, fearfulness or inability to access healthcare despite working.
Workplace practice	No contract, false job description, repeated unpaid work, compulsory overtime, unsafe work, isolation or penalties for refusing shifts.
Child or vulnerable person	A child working or being transported in concerning circumstances, or an adult whose vulnerability is being exploited for labour, criminal or domestic purposes.

No single indicator proves modern slavery. Staff should consider the overall picture, record facts and escalate. They must not conduct their own covert investigation, confront a suspected exploiter or make promises they cannot keep.

18.2 Reporting routes

- Immediate danger or threat to life: call 999.
- Urgent safeguarding concern: notify the responsible manager or Director immediately and follow adult or child safeguarding procedures.
- Non-emergency suspected crime: contact the police on 101 or seek Director guidance on an appropriate referral.
- Labour exploitation or recruitment concern: escalate to the Director and consider the Fair Work Agency, Gangmasters and Labour Abuse Authority or Modern Slavery Helpline as appropriate.
- Concern involving a manager or normal reporting route: contact the alternative Director or use the whistleblowing route.
- Concern arising during direct support: record relevant factual information in Birdie where appropriate, but do not place confidential whistleblowing details in a general care record. Complete the separate safeguarding or incident escalation.

DO NOT CONFRONT

Do not confront

A suspected trafficker, recruiter, landlord or controller must not be confronted by an individual worker. Confrontation can increase danger, destroy evidence or cause the potential victim to disappear.

19 Response, investigation and victim-centred remediation

Our response will focus on the person's safety, wishes, rights and practical needs. We will act promptly but carefully. The absence of complete proof will not prevent protective action where risk is credible.

19.1 Immediate response stages

1. Assess immediate danger, medical needs, safeguarding and whether emergency services are required.
2. Speak to the person privately where safe and use appropriate communication support.
3. Avoid confronting or alerting a suspected exploiter unless directed by competent authorities.
4. Record factual information, preserve relevant documents and restrict access to those with a need to know.
5. Consider consent, capacity, child protection and information-sharing duties.
6. Seek specialist or statutory advice and make referrals through appropriate first-responder, safeguarding, police or labour enforcement routes.
7. Protect the person from retaliation, loss of shifts, unsafe return, homelessness or other foreseeable harm within our influence.
8. Notify insurers, clients, commissioners, professional regulators or other bodies where required and lawful.
9. Open a corrective action plan and ensure Board oversight of serious cases.

19.2 Remediation principles

- Do no further harm. Consider the consequences before suspending work, cancelling accommodation or terminating a supplier.
- Prioritise repayment of unlawful fees, wages or deductions where Heartbeat Healthcare or a supplier is responsible and recovery is possible.
- Provide or signpost access to independent support, legal advice, healthcare, safeguarding, housing or immigration advice as appropriate.
- Respect an adult potential victim's views and consent unless a legal or safeguarding exception applies.
- Do not make continued employment conditional on withdrawing a complaint or refusing to cooperate with authorities.
- Investigate system causes, including incentives, targets, weak contracts, inadequate checks and management behaviour.
- Share anonymised learning and verify that corrective action has reduced risk.

19.3 National Referral Mechanism

The National Referral Mechanism is the UK framework for identifying and supporting potential victims. Referrals can be made only by designated first responder organisations. Adult referrals generally require informed consent. Children do not need to consent to referral and must be referred urgently through child protection arrangements. Heartbeat Healthcare will cooperate with an appropriate first responder and will not claim to be one unless formally designated.

20 Training, awareness and capacity building

Training will be proportionate to role. The objective is not merely to complete a course, but to ensure people can recognise concerns, respond safely and apply ethical recruitment standards in daily work.

Audience	Minimum learning	Frequency and evidence
Directors and senior managers	Legal duties, governance, sector risks, victim-centred remediation, supplier decisions, public reporting and case review.	On appointment, annual refresher and case-based update. Evidence in training record and governance minutes.
Recruitment and compliance staff	Recruitment fees, debt, documents, deceptive offers, international recruitment code, worker interviews, right-to-work checks and escalation.	Before independent recruitment activity and annual refresher. Competence checked through scenarios and file audit.
Payroll, scheduling and operational staff	Unusual payment arrangements, unlawful deductions, excessive hours, third-party control, welfare indicators and reporting routes.	Induction and annual refresher, with supervision discussion.
Direct support workers	Signs of exploitation in households and communities, safeguarding, safe recording, emergency response and non-confrontation.	Induction, periodic safeguarding refreshers and spot-check discussion.
All workers	Company commitment, worker rights, no recruitment fees, whistleblowing, non-retaliation and how to obtain help.	Induction information and accessible annual awareness.
Higher-risk suppliers and recruiters	Contract expectations, worker fee prohibition, disclosure, remediation and evidence requirements.	At onboarding and contract review; acknowledgement retained.

20.1 Training effectiveness

Effectiveness will be checked through knowledge questions, recruitment file audits, worker interviews, scenario discussions, quality meetings and review of whether concerns are reported and handled appropriately. A high completion rate with poor practice will not be treated as effective training.

21 Information, records and Birdie

Reliable records support transparency and allow patterns to be identified. Recruitment, worker, supplier, payroll, concerns, training and action-plan records will be complete, factual, attributable, secure and retained according to applicable law and our retention schedule.

21.1 Birdie care management software

For direct unregulated support services, Birdie supports electronic support plans, risk information, visit records, daily notes, alerts and management oversight. Staff may use Birdie to record factual observations relevant to a person's safety or wellbeing. A Birdie note does not replace immediate safeguarding escalation, emergency action or a confidential whistleblowing report. Information about a suspected exploiter will be recorded only where necessary, proportionate and safe.

21.2 Data protection and sharing

Modern slavery concerns may involve special category data, criminal allegations, immigration information and details about third parties. Information will be shared on a need-to-know basis and in accordance with safeguarding, legal and data protection requirements. Staff will document the reason for significant information-sharing decisions. Confidentiality will not be used to prevent necessary action to protect a child or adult at risk.

22 Monitoring effectiveness and key performance indicators

As a newly established company, our first priority is to create a reliable baseline. Targets are designed to be realistic for a small organisation while still requiring measurable action. Data will be interpreted with context and will not be manipulated to present a favourable picture.

Measure	2026/27 target	Evidence
Worker pre-deployment compliance	100% of workers cleared against mandatory identity, right-to-work, role, reference, training and relevant DBS or professional checks before deployment.	Monthly file check and quarterly dashboard.
Recruitment fee declaration	100% of newly recruited workers asked whether they paid any person for the job or related introduction.	Recruitment checklist and sample audit.
Approved recruiters and labour providers	100% of labour providers risk assessed and approved before use; 100% of higher-risk providers subject to enhanced due diligence.	Supplier register and Director approval.
Modern slavery training	100% of Directors and recruitment/compliance staff trained by 30 September 2026; at least 95% of active workers complete appropriate awareness by 31 December 2026.	Training matrix and competence checks.
Worker welfare contact	100% of internationally recruited or otherwise higher-risk new workers offered a private welfare check within the first four weeks and again by three months.	Welfare check log and themes.
Concern response	100% of urgent concerns assessed on the same day; all other modern slavery concerns reviewed within one working day.	Concern and escalation log.
Corrective action	No overdue critical action; at least 90% of other actions completed by target date, with effectiveness verified.	Improvement plan.
Supplier contractual controls	Modern slavery and ethical recruitment clauses included in all new higher-risk labour and recruitment contracts.	Contract review.
Annual disclosure	Risk assessment, Board review and statement updated annually.	Board minutes and website publication.

22.1 What we will report next year

- Number and percentage of relevant workers asked about recruitment fees.
- Training completion by role and any competence gaps identified.
- Number of labour providers assessed, approved, conditionally approved or rejected.
- Number and nature of modern slavery concerns, without identifying individuals.
- Remediation actions, including fee or wage recovery where applicable.
- Audit findings, repeat weaknesses and action closure.
- Worker welfare themes and changes made as a result.
- Progress against each action in the 2026/27 plan.

23 First reporting period: progress and current position

Heartbeat Healthcare Ltd was incorporated late in 2024 and this is its first reporting period. The company did not have a mature, separately reported modern slavery programme throughout the full period. We therefore present our progress transparently rather than implying a level of historical assurance that cannot yet be evidenced.

Area	Status	Comment
Company and Board accountability established	In place	Directors identified, statement owner appointed and Board approval recorded.
Comprehensive quality management framework	In place by approval date	Quality policy establishes lawful scope, recruitment controls, audit, risk management, feedback and corrective action.
Equality and human rights framework	In place by approval date	Comprehensive policy supports dignity, fair treatment, reasonable adjustments and non-retaliation.
Environmental and responsible procurement framework	In place by approval date	Environmental policy and Carbon Reduction Plan support responsible purchasing and supplier consideration.
Birdie care management software	In use / implementation	Supports authorised support records, daily notes, alerts and management oversight for direct support activity.
Dedicated modern slavery risk assessment and statement	Established by this statement	First organisation-specific risk profile, due diligence expectations, KPIs and action plan approved.
Supplier and recruiter modern slavery questionnaire	To be implemented	Template included in Appendix B and scheduled for rollout during 2026/27.
Modern slavery training baseline	To be implemented	Role-based training targets set for 2026/27.
Published incident and remediation data	Baseline not yet mature	Future statements will report transparent aggregate data once systems have operated for a full cycle.

HONEST FIRST-YEAR REPORTING

Honest first-year reporting

We do not report “zero incidents” as proof of effectiveness. A new or immature system may simply not have been capable of identifying concerns. Our 2026/27 plan focuses on building worker trust, asking better questions and maintaining evidence.

24 Modern slavery action plan 2026/27

No.	Action	Owner	Target	Success evidence
1	Approve and publish this statement with a website link.	Shadreck Chawira	30 Jun 2026	Published statement and Board record.
2	Introduce a modern slavery risk register covering recruitment routes, suppliers, services and countries.	Quality / Compliance Lead	31 Jul 2026	Approved register with owners and review dates.

No.	Action	Owner	Target	Success evidence
3	Add a recruitment fee, debt, document control and accommodation declaration to candidate onboarding.	Recruitment Lead	31 Aug 2026	Updated checklist and completed declarations.
4	Risk assess and approve all active recruitment and labour providers, including disclosure of sub-agents.	Director / Compliance	30 Sep 2026	Supplier files and approval decisions.
5	Complete role-based training for Directors and recruitment/compliance staff.	Director	30 Sep 2026	Training and competence records.
6	Include modern slavery and ethical recruitment clauses in new higher-risk labour and recruitment contracts.	Director / Contract Owner	31 Oct 2026	Contract clause checklist.
7	Roll out accessible awareness information to active workers and provide reporting routes.	Management	31 Dec 2026	At least 95% completion and communication evidence.
8	Implement private welfare checks for internationally recruited and higher-risk workers.	Management	31 Dec 2026	Welfare log, themes and action records.
9	Audit recruitment files, payroll indicators, worker fees and supplier assurance.	Quality Lead	Quarterly from Dec 2026	Audit reports and corrective action.
10	Review Birdie and incident-recording guidance to ensure modern slavery concerns trigger separate safeguarding escalation.	Quality Lead	31 Dec 2026	Updated guidance and staff briefing.
11	Complete an annual effectiveness review and Board challenge session.	Board of Directors	30 Jun 2027	Governance minutes and KPI review.
12	Publish the next statement for the year ending 31 March 2027.	Board of Directors	30 Sep 2027	Board-approved website statement.

Target dates may be brought forward where contract mobilisation or international recruitment makes an action immediately necessary. Any delay will be recorded with the reason, interim control, revised date and Director approval.

25 Continuous improvement and future reporting

We expect our approach to develop as the organisation grows. Future statements will build on evidence rather than repeating generic commitments. We will review the risk assessment, worker feedback, recruitment routes, supplier performance, legal developments, sector concerns and the effectiveness of remediation.

25.1 Triggers for early review

- A credible allegation or confirmed case of exploitation.
- Commencement or material expansion of international recruitment or sponsorship.
- Use of a new labour provider, recruitment market or higher-risk country.
- A serious payroll, accommodation, immigration or document-retention concern.
- A major public contract requirement, merger, acquisition or rapid expansion.
- Legal, regulatory or Home Office guidance changes.
- An audit, worker survey or whistleblowing disclosure showing that current controls are ineffective.

25.2 Independent assurance

As the business grows, the Board will consider whether independent review, specialist advice, external audit, sector collaboration or use of the government Modern Slavery Assessment Tool would provide proportionate additional assurance. We will not claim independent certification or verification unless it has actually been obtained and the scope is clear.

26 Approval, declaration and publication

This statement was approved by the Board of Directors of Heartbeat Healthcare Ltd on 20 June 2026. It is signed by Shadreck Chawira, Director, on behalf of the Board. It covers the financial year ended 31 March 2026 and records current controls and the commitments approved for 2026/27.

Approved by

Board of Directors

Directors	Shadreck Chawira and Nyararayi Fleur Chimwadzimba
Signed by	Shadreck Chawira, Director
Date	20 June 2026



Shadreck Chawira

Director, Heartbeat Healthcare Ltd

Date: 20 June 2026

Appendix A - Practical indicators and staff response guide

This guide supports awareness. It does not replace professional judgement, safeguarding procedures or emergency action.

Situation	Expected response
A worker says they paid for the job	Listen privately. Ask who was paid, how much, what was promised, whether debt or threats are involved, and whether others are affected. Escalate to the Director. Do not blame the worker.
A passport or bank card is held by someone else	Establish whether the worker can access it freely. Treat restricted access as a serious control indicator. Do not confront the holder. Escalate and assess immediate safety.
Wages go to another person	Check whether the worker genuinely chose this and can change it. Review payroll records and potential coercion. Escalate concerns.
A worker cannot refuse shifts	Ask privately about threats, penalties, debt, immigration pressure or accommodation. Review scheduling and management conduct.
The worker is always accompanied	Seek a safe private opportunity. Do not insist if it increases risk. Record the concern and obtain safeguarding advice.
A person supported appears controlled in their home	Prioritise immediate safety. Record factual observations in the appropriate system, alert the safeguarding lead and avoid confronting the suspected controller.
A recruiter refuses to disclose sub-agents	Do not approve or continue the route without satisfactory transparency and Director review.
A supplier admits a serious labour issue	Focus on worker safety and remedy. Obtain facts, require an action plan, consider external referral and avoid abrupt disengagement that harms workers.

Appendix B - Supplier and labour-provider due diligence questionnaire

Question area	Evidence or response required
1. Legal identity	Provide registered name, number, address, ownership and principal contacts.
2. Service and workforce	Describe services, worker categories, countries of recruitment and locations of work.
3. Recruitment chain	List all recruiters, sub-agents, referral partners and labour subcontractors used.
4. Worker fees	Confirm whether any worker pays job-finding, introduction, sponsorship, placement or related recruitment fees. Explain all worker-borne costs.
5. Contracts and pay	Explain how workers receive terms, pay rates, payslips, holiday, working hours and deductions.
6. Documents	Confirm that passports, biometric cards, bank cards and original documents are not retained or controlled.
7. Accommodation and transport	Describe any linked accommodation or transport, charges, agreements and worker freedom to opt out.
8. International recruitment	Confirm compliance with the DHSC Code of Practice and Ethical Recruiters List where applicable.
9. Modern slavery controls	Provide policies, risk assessments, training, worker reporting routes and due diligence arrangements.
10. Incidents	Disclose substantiated modern slavery, labour abuse or recruitment fee concerns in the last three years and the remediation taken.
11. Subcontracting	Confirm how equivalent standards are flowed down and monitored.
12. Audit and cooperation	Confirm willingness to provide evidence, participate in worker interviews and complete corrective action.

Approval decision: ☐ Approved ☐ Approved with conditions ☐ Further evidence required ☐ Rejected

Risk rating: ☐ Low ☐ Moderate ☐ High ☐ Critical Review date: _____

Approved by: _____ Date: _____

Appendix C - Worker welfare check

The conversation should be private, supportive and not conducted in the presence of a recruiter, landlord, family member or other person who may influence the worker. The worker should be told why the questions are asked and how concerns will be handled.

10. **Did you pay any person or organisation to obtain this job, interview, introduction, sponsorship or placement?**

Notes: _____

11. **Did you borrow money or enter into a debt because of this job or your travel to the UK?**

Notes: _____

12. **Does the job, pay, location, hours and accommodation match what you were promised?**

Notes: _____

13. **Do you hold and control your own passport, biometric card, bank card, phone and personal documents?**

Notes: _____

14. **Are any deductions made from your wages? Do you understand and agree with them?**

Notes: _____

15. **Can you refuse additional shifts or leave the job in accordance with your contract without threats?**

Notes: _____

16. **Does anyone control where you live, how you travel, who you speak to or how you spend your wages?**

Notes: _____

17. **Have you or your family been threatened because of work, debt, immigration status or leaving employment?**

Notes: _____

18. **Do you know how to contact Heartbeat Healthcare privately and raise a concern?**

Notes: _____

19. **Is there anything about your recruitment or work that makes you feel unsafe, trapped, misled or treated unfairly?**

Notes: _____

Outcome: ☐ No concern identified ☐ Advice provided ☐ Manager review ☐ Safeguarding escalation ☐ External referral

Actions, owner and target date: _____

Completed by: _____ Date: _____

Appendix D - Modern slavery concern escalation flow

Stage	Required action
1. Recognise	A disclosure, indicator, payroll anomaly, supplier concern or safeguarding observation is identified.
2. Protect	Check immediate safety. Call 999 if there is danger or urgent medical need. Do not confront a suspected exploiter.
3. Listen and record	Speak privately where safe, use communication support, record facts and avoid promises of absolute confidentiality.
4. Escalate	Inform the responsible manager or Director immediately according to risk. Use the alternative Director if normal management is implicated.
5. Refer and report	Consider safeguarding, police, first responder, labour enforcement, professional regulator, client, commissioner and insurer routes.
6. Remediate	Protect income, accommodation and welfare where possible; recover fees or wages; prevent retaliation; support access to specialist help.

Stage	Required action
7. Learn	Investigate root causes, complete corrective action, review other workers or suppliers, share anonymised learning and verify effectiveness.

Appendix E - Annual KPI dashboard

Measure	Target	Actual	RAG	Comment / action
Workers deployed				
Worker files fully cleared before deployment				
New workers asked about recruitment fees				
International or higher-risk worker welfare checks completed				
Active recruitment or labour providers				
Providers with completed risk assessment				
Higher-risk suppliers with enhanced due diligence				
Modern slavery training completion				
Concerns raised				
Urgent concerns assessed same day				
Fees or wages recovered				
Critical corrective actions overdue				
Statements published on time				

Appendix F - Recruitment fee and document control declaration

This declaration helps identify exploitation risk. A disclosure will not automatically prevent employment and must not be used to blame or disadvantage the candidate.

Candidate / worker name	
Role	
Recruitment route / recruiter	
Country of recruitment, if relevant	
Date of declaration	

I have not been charged a fee for Heartbeat Healthcare Ltd to find or try to find me work. ☐ Confirmed ☐ I need to disclose a fee

I have received accurate information about the role, pay, hours, location and main terms. ☐ Confirmed ☐ Concern or difference

I hold and control my own passport, biometric card, bank card and original documents. ☐ Confirmed ☐ Concern

I understand any lawful deductions and have received an opportunity to ask questions. ☐ Confirmed ☐ Concern

I know how to raise a concern privately and understand that retaliation is prohibited. ☐ Confirmed ☐ More information needed

Details of any fee, debt, document concern or difference from the offer:

Candidate / worker signature: _____ Date: _____

Completed / reviewed by: _____ Date: _____

Escalation required: ☐ No ☐ Yes Reference / action: _____

END OF STATEMENT**End of statement**

This document is reviewed annually or sooner where risk, law, business activity or experience requires change. The current approved electronic version should be used.