

TC Care Global Ltd
Modern Slavery and Human Trafficking Statement

1. Introduction

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and outlines the steps taken by TC Care Global Ltd to prevent modern slavery and human trafficking in our business and supply chains.

We recognise that preventing modern slavery is integral to delivering safe, person-centred care and meeting the standards set by the Care Quality Commission. We maintain a zero-tolerance approach and are committed to acting ethically, transparently, and with integrity in all our operations.

What Do We Mean by Modern Slavery?

Modern slavery can take many forms; it is a complex and multi-faceted problem. The Modern Slavery Act 2015 covers four key criminal activities:

1. Slavery: where ownership is exercised over an individual
2. Servitude: involves the obligation to provide service imposed by coercion
3. Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
4. Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in The Modern Slavery Act 2015, include, but are not limited to:

- Child labour: whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common is the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights. Tackling modern slavery requires our clients to play a part and remain vigilant to the risk in all aspects of our business and business relationships.

2. Our Organisation, Structure and Supply Chains

TC Care Global Ltd is a leading healthcare company. Run by health professionals with 40 years of combined experience in health sectors comprising the NHS Hospitals, Private Care Homes, Private Hospitals, Nursing and Residential Care throughout the United Kingdom. We are dedicated to providing exceptional staffing solutions to healthcare organisations across the country. With a deep understanding of the UK healthcare system and a commitment to excellence, we strive to connect healthcare professionals with the best opportunities and support our clients in building high-performing teams.

Our organisational structure includes:

- RGN, RMN, HCA's, Care workers and Support staff
- Coordinators and field supervisors
- Registered Manager and Senior Leadership

Our supply chains include:

- Training and compliance providers
- Care-related suppliers and service providers

In line with Care Quality Commission expectations, we recognise that the use of agency staff, international recruitment, and lone working environments can present increased safeguarding and modern slavery risks. These risks are actively managed through robust governance processes.

3. Policies and Governance Framework

We maintain a comprehensive policy framework to support ethical practice and safeguarding, including:

- Modern Slavery and Human Trafficking Policy
- Safeguarding Policy
- Human Rights Policy
- Whistleblowing Policy
- Safer Recruitment Policy
- Right to Work Checks
- Agency Staff Policy
- Employee Code of Conduct

These policies align with safeguarding principles required by the Care Quality Commission and ensure staff understand their duty to protect both service users and colleagues from abuse, including exploitation.

Our governance framework ensures:

- Clear accountability at Registered Manager and Director level
- Regular policy review
- Integration with safeguarding and incident reporting systems

4. Due Diligence Processes

We apply proportionate and risk-based due diligence to ensure safe recruitment and ethical supply chain practices.

Suppliers

- Pre-engagement checks including online screening for modern slavery offences
- Contractual obligations requiring compliance with our standards
- Supplier assurances that:
 - Modern slavery risks are addressed
 - Their own supply chains are monitored
 - Workers are treated fairly and paid appropriately

Recruitment and Workforce Controls

- Use of approved recruitment agencies only
- Agencies must align with standards set by industry set by industry good standard
- Mandatory checks include:
 - Right to work verification
 - Identity Verification
 - DBS clearance

- Verified references and Employment History
- Verified Qualifications
- Verified Training

Agencies must confirm that workers:

- Are not charged recruitment fees
- Do not experience unlawful wage deductions

These controls support CQC “Safe” and “Well-led” requirements, ensuring staff are suitable, protected, and lawfully employed.

5. Risk Assessment and Safeguarding

Modern slavery is considered within our wider safeguarding responsibilities.

We identify higher-risk areas as:

- Agency staffing arrangements
- International recruitment pathways
- Lone working environments

To manage these risks, we:

- Conduct supplier and agency risk assessments
- Maintain daily oversight of staff through supervisors and coordinators
- Ensure regular welfare contact with all staff, including those working alone
- Integrate modern slavery awareness into safeguarding processes

In line with Care Quality Commission expectations, any concerns relating to exploitation are treated as safeguarding issues and escalated promptly in accordance with local authority and statutory reporting procedures.

6. Effectiveness and Monitoring

We monitor the effectiveness of our approach through governance and quality assurance systems aligned with Care Quality Commission standards.

Key performance indicators include:

- Staff training completion rates
- Number and nature of safeguarding or whistleblowing concerns raised
- Compliance rates for recruitment and supplier checks
- Outcomes of audits and spot checks

These indicators are reviewed by senior management to ensure continuous improvement and effective oversight.

7. Training and Workforce Awareness

All staff receive training on modern slavery and human trafficking as part of induction and ongoing mandatory training.

Training ensures staff:

- Understand indicators of modern slavery
- Recognise risks within care settings
- Know how to escalate concerns appropriately

We provide:

- Accessible training materials for all staff, including those with English as a second language
- Digital access to policies via approved training providers
- Ongoing support from our Registered Manager, Supervisors and Managers

This supports the Care Quality Commission expectation that staff are competent, confident, and supported to deliver safe care.

8. Speaking Up and Safeguarding Culture

We promote a strong culture of openness and transparency.

Staff are encouraged to raise concerns through:

- Line management
- Whistleblowing channels
- Safeguarding procedures
- External authorities where appropriate

All concerns are taken seriously, investigated promptly, and managed in line with safeguarding responsibilities and regulatory expectations.

9. Leadership, Accountability and Review

Responsibility for this statement and its implementation sits with senior leadership and our Registered Manager, Anthony Onwuegbuzie.

In line with Care Quality Commission “Well-led” standards, we ensure:

- Clear accountability structures
- Regular review of policies and procedures
- Continuous improvement through learning and feedback

This statement is reviewed annually and updated as required.

10. Approval

Signed:



Anthony Onwuegbuzie
Registered Manager / Director
Date: 03/04/2026

Reviewed/Written by: Anthony Onwuegbuzie	Modern Slavery and Human Trafficking Statement
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