



Community Integrated Care Group Modern Slavery & Human Trafficking Statement

This statement is made in relation to the Modern Slavery Act 2015 and sets out the steps that the Community Integrated Care Group has, and is continuing to take, to ensure that modern slavery and human trafficking cannot take place within our business.

The Board of Trustees and Senior Management of Community Integrated Care and its subsidiaries are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any of our business dealings and relationships.

Our Business

Community Integrated Care is one of the UK's largest and most progressive health and social care charities, with a proud heritage of transforming lives through high-quality, person-centred support that promotes independence, choice and empowerment. Founded in 1988, with a long history of innovation and championing change, we now support more than 2,600 individuals across England and Scotland, delivered by a skilled and compassionate workforce of over 6,500 colleagues. Our services are underpinned by deep expertise in supporting people with learning disabilities, autism, and mental health needs and young people in care. We have an annual Group turnover of £ 216,178k with 6684 employees (including bank staff) operating in England and Scotland.

The Group consists of seven companies:

- Community Integrated Care – a registered Charity – adult social care,
- Age Exchange, a registered Charity – reminiscence and arts,
- Inspire (Partnership Through Life) Limited – adult social care,
- ARC HD Limited, supporting children and young People,
- Ingle Tec Limited – technology and innovation,
- Access Community Services Limited – adult social care, and
- Person Cantered Housing Limited – property ownership.

Our Modern Slavery and Human Trafficking Policy applies across the Group and reflects our commitment to act ethically and with integrity in all our business relationships. We also undertake appropriate due diligence and have effective controls in place to identify potential risk areas and to report and act upon any concerns.

Our Policies

We have a number of internal policies and procedures to ensure that we are conducting our business in an ethical and transparent way. All policies and procedures are regularly reviewed and updated:

- **Modern Slavery & Human Trafficking Policy:** with clear signposting to key points of contact, colleagues are encouraged to report any concerns. The Policy is designed to support the prevention, detection and to address all forms of modern slavery, including forced labour, human trafficking and exploitation within supply chains.
- **Code of Practice:** Our Code of Practice provides important guidelines for interactions with colleagues, people we support, suppliers and other business partners. At the core of the Code of Practice and in the Group's policies and procedures, we are an equal-opportunities employer committed to creating and ensuring a non-discriminatory and respectful working environment for our colleagues. Our robust recruitment and people management processes are designed to ensure that all prospective colleagues are legally entitled to work in the UK and to safeguard colleagues from any abuse or coercion while in our employment.

- **Recruitment and Selection:** We continue to operate robust safe recruitment procedures, including conducting Right to Work in the UK checks for all colleagues to safeguard against human trafficking and/or individuals being forced to work against their will. Additionally, we have an open and transparent pay structure, set about the minimum wage, and we ensure that working hours and rota practices comply with national requirements with particular consideration to working time regulations, and health and safety regulations.
- **Speak Out:** Our Speak-Out (Whistleblowing) Policy encourages all colleagues to raise concerns including potential violations of the Code of Practice, company policies, and the laws of England and Scotland. We have reporting mechanisms in place to collect and relay information regarding potential violations to appropriate company resources for review and follow-up action. We have commenced a programme of targeted training sessions for colleagues to further increase awareness and understanding of our key compliance topics, including our Speak-Out framework.
- **Grievance:** Our Grievance Policy encourages all colleagues to raise any concerns they have about their workplace, how they are treated and how things are done. The ACAS compliant policy encourages informal raising of concerns where possible, and where not possible, supports colleagues through the process. Our leadership are fully trained on handling grievances and have support from a large and dedicated team of People professionals to guide them and colleagues through the process.
- **Equality and Diversity:** our policy sets out the Group's commitment to providing a working environment free from any form of discrimination, harassment and bullying. It also seeks to ensure all colleagues, People Supported, their families and other representatives are treated and treat others with dignity and respect. We investigate, record, and manage any reported cases where things have gone wrong, when an undesirable experience is raised or observed and/or where malpractice is reported.
- **Dignity at Work:** our dignity at work policy promotes a culture of dignity, respect and inclusion at work. It defines acceptable and unacceptable behaviours and provides support for those who experience or witness bullying, harassment, sexual harassment, victimisation or other inappropriate conduct at work. The Policy details how to take steps to report any concerns and details the support that will be given.
- **Health and Wellbeing:** We are committed to ensuring that our colleagues are supported throughout their employment with us and have access to wellbeing support that helps them, whether from their immediate line manager or through the dedicated regional people specialist, systems and process are in place to identify and support colleagues through physical and mental ill health and distress. Our You Can appraisal process includes prompts and supports for colleagues and leaders to talk candidly about any concerns during weekly, monthly and quarterly meetings.
- **Employee Assistance Programme:** the Group engages 24/7/365 external wellbeing support through Spectrum Life. This confidential process allows colleagues and their families to obtain independent advice and support in any circumstance where they want additional confidential support.
- **Unfair to Care:** Our annual Unfair to Care Campaign, now in its 5th year, seeks to encourage parliament to address the apparent unfairness between colleagues in the Social Care Sector against comparator colleagues in the NHS. We believe that fairness in pay will bring enhance quality of life for all care workers and together with our open and transparent pay principles, will support the eradication of poverty and unwelcome employer practices within the Sector.
- **Colleague Inclusion Networks:** we have in place a number of Inclusion Networks encouraging colleagues from diverse backgrounds and beliefs to meet regularly with leadership to share experiences, influence change and raise awareness on salient topics in a safe and supportive environment.

Our Suppliers

Our supply chain relates to the provision of goods and services that an organisation involved in the provision of social care would normally require e.g. business support and supply of labour. In addition, we campaign with and on behalf of the people we support, their families and carers.

We have zero tolerance approach to modern slavery and human trafficking. We are committed to ensuring our supply chains are free from modern slavery and human trafficking and work only with those organisations who also want to and can demonstrate they also take the same approach.

To ensure all those in our supply chain comply with our values, we operate a supplier process which ensure that all suppliers perform in line with our terms and conditions, we also maintain a systemised preferred supplier list through. We conduct due diligence on suppliers before placing them on our preferred supplier list. Our procurement procedure forms part of our contract with all suppliers who are required to confirm to no part of their business operates contrary to this policy. In addition, we require that supplier confirm:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- They abide by legislation including national minimum wage and working time regulations.

Assessing and managing risk

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our supply chains and workforce and expect suppliers to ensure adherence to our values and ethical standards, vetting for suitability wherever possible.
- We have established appropriate policies and processes within our organisation to make sure that the products we purchase comply with our ethical standards.
- We have implemented a two-stage review process of supplier modern slavery policies and processes
- We actively challenge where suppliers are not able to provide a modern slavery and human trafficking statement to ensure they align to our standards.

Due diligence in relation to modern slavery (including approach to remediation)

We continue to review ways in which we can tackle slavery and human trafficking within our sector. We also assess how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or our supply chains by:

- Ensuring HR and payroll systems are effective to identify and report on any potential breach of legislation.
- Undertaking regular reviews of our purchasing and due diligence processes.
- Maintaining good and open communication with our suppliers to ensure there is clear understanding of expectation, activity and compliance.
- Ensuring colleagues are trained and sensitive to the impact of the legislation and its possible impact on our activities.
- Hold regular open discussions between teams including Legal and Supply Chain to encourage dialogue on suppliers' due diligence information.

Training

As part of our commitment to preventing modern slavery and human trafficking colleagues are required to be familiar with the Act and complete relevant online training. Training has been delivered at all senior levels within the organisation including presentation to the Board of Trustees, the Executive Team and regional leadership teams. This training includes how to identify and escalate any concerns in line with our policies. Colleagues have access to policies including Speak Out and are encouraged to raise any concerns about their own treatment by the company, or individual colleagues, in confidence and without fear and will be investigated in line with our internal procedures.

Monitoring and evaluation (understanding and demonstrating effectiveness)

During the last 12 months we have not identified any concerns in relation to Modern Slavery and Human Trafficking. By way of continuous improvement, recent recruitment has included a dedicated Procurement Manager and Equality Diversity and Inclusion Manager, both roles will further support the Group's aims, ambitions and determination to ensure the Community Integrated Care Group remains free from modern slavery and human trafficking.

Next steps

During the next 12 months we have plans to:

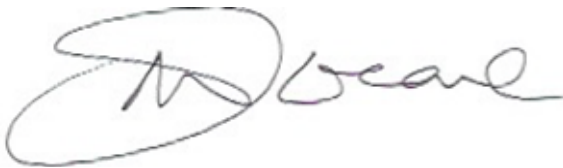
- Set up a Modern Slavery Working Group to assess, monitor and mitigate risks relating to slavery and human trafficking within the organisation, with individual departments taking specific actions where appropriate to the level of risk
- Continue to undertake additional due diligence, including annual review, on all suppliers to enable us to make better judgements on transactions and the integrity of our supply chain
- Enhance our core learning to ensure Modern Slavery and Human Trafficking is threaded throughout relevant policies and to offer training to all levels on how to identify and report any concerns whether in work or in their personal lives.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group slavery and human trafficking statement for the financial year ending 31 March 2026.

Approval for this statement

This statement was approved by our Board of Trustees and signed by the Board Chair, Mandy Wearne on 24th June 2026

Name: Mandy Wearne, Chair of the Board of Trustees

A handwritten signature in dark ink, appearing to read 'Mandy Wearne', with a large, stylized initial 'M'.

Signature:

Date: 24th June 2026