

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

A voluntary public statement of Tamney Healthcare Ltd's commitment to ethical employment, responsible recruitment, safeguarding and transparent supply chains

Version	Approval date	Reporting period
1.2	17 June 2026	1 February 2026 to 31 January 2027

Our position

Tamney Healthcare Ltd does not currently meet the £36 million turnover threshold that makes publication mandatory under section 54 of the Modern Slavery Act 2015. We publish this statement voluntarily because preventing exploitation is integral to safe care, fair employment, responsible procurement and public trust.

**Approved by Kudzai Chibamu
Director and Registered Manager**



Document control and public status

Control	Details
Document title	Modern Slavery and Human Trafficking Statement
Organisation	Tamney Healthcare Ltd
Company number	14569063
CQC provider ID	1-20709201725
Registered office	64 Greenfield Way, Hampton Water, Peterborough, Cambridgeshire, PE7 8RX
Statement owner	Kudzai Chibamu, Director and Registered Manager
Version	1.2
Approval and publication date	17 June 2026
Reporting period	1 February 2026 to 31 January 2027
Review cycle	Annual, and sooner following a material change, serious concern, legal change or significant supply-chain development
Next scheduled publication	No later than 31 July 2027
Publication	Approved for publication on the Tamney Healthcare Ltd website

Transparency note

This is a voluntary statement. It describes the controls in force at the date of approval and the actions Tamney Healthcare Ltd will maintain and develop during the reporting period. We will not make claims that cannot be evidenced. Any material limitation, concern or confirmed incident will be addressed openly and proportionately.

Contents

1	Commitment and legal position
2	Our organisation, workforce and supply chains
3	How we define modern slavery
4	Risk assessment and priority risk areas
5	Governance, accountability and policies
6	Responsible recruitment and fair employment
7	Supplier and subcontractor due diligence
8	Safeguarding people who may be exploited
9	Training, awareness and speaking up
10	Responding to concerns and supporting potential victims
11	Monitoring effectiveness and performance measures



1	Commitment and legal position
12	2026 to 2027 improvement commitments
13	Approval and declaration
Appendix A	Modern slavery risk indicators
Appendix B	Supplier assurance requirements

1. Commitment and legal position

Tamney Healthcare Ltd has zero tolerance for slavery, servitude, forced or compulsory labour, human trafficking, debt bondage, deceptive recruitment, domestic servitude, forced criminality, child exploitation and every other form of severe labour or human exploitation. We are committed to acting ethically, lawfully and transparently in our own operations and in the organisations from which we obtain people, goods and services.

We recognise that modern slavery can be hidden. It may occur through apparently legitimate recruitment, employment, accommodation, transport, agency labour, subcontracting or supply arrangements. It may also affect people receiving care, relatives, staff, applicants or workers employed by other organisations. Our approach therefore combines safeguarding, responsible recruitment, employment controls, procurement due diligence, staff awareness and effective escalation.

Section 54 of the Modern Slavery Act 2015 requires certain commercial organisations carrying on business in the United Kingdom and meeting the prescribed turnover threshold to publish an annual slavery and human trafficking statement. Tamney Healthcare Ltd does not currently meet the £36 million threshold. We nevertheless adopt the same core transparency principles and publish this statement as a matter of good governance and corporate responsibility.

Our commitments are also linked to our duties as a regulated care provider. Modern slavery may constitute abuse, neglect, exploitation, coercive control, a criminal offence and a safeguarding concern. Where a concern involves a person with care and support needs, a child, a worker or another person at risk, we will activate the appropriate safeguarding and reporting pathway without delay.

Non-negotiable commitment

No commercial pressure, staffing shortage, cost saving, contractual demand or operational inconvenience justifies exploitation. We will not knowingly benefit from forced labour or human trafficking and we will not continue a relationship with a worker, recruiter, supplier or subcontractor that refuses to address a credible modern slavery concern.

2. Our organisation, workforce and supply chains

Tamney Healthcare Ltd is a private company registered in England and Wales and a CQC-registered provider of personal care. We support adults, including older people and adults living with dementia, physical disabilities or sensory impairments. Our services are delivered mainly in people's own homes and community settings.

Our workforce may include directors, registered managers, care coordinators, care and support workers, administrative staff, bank workers and, where necessary, approved agency workers or specialist contractors. Our care model depends on trustworthy relationships, safe lone working, reliable workforce deployment and respectful employment practices.

Our principal supply-chain categories may include:

- recruitment, advertising, pre-employment checking and temporary staffing services
- training providers, professional advisers and occupational health services
- care management software, telecommunications, cloud services and information technology equipment
- personal protective equipment, uniforms, continence products, first-aid items and other care consumables
- cleaning products, stationery, office equipment and confidential waste services
- transport, vehicle, maintenance and courier services

- property, facilities, utilities and professional support services
- subcontracted or partnership services where these are lawfully and contractually permitted

Some categories have longer or less visible supply chains. Goods such as gloves, uniforms, electronic devices and cleaning products may involve raw materials, manufacturing, packaging, logistics and labour in several countries. Recruitment and labour supply may also involve intermediaries. We therefore apply due diligence in proportion to the risk, influence and value of the relationship rather than assuming that a UK-based supplier is automatically low risk.

3. How we define modern slavery

For the purpose of this statement, modern slavery includes conduct that removes or severely restricts a person’s freedom for another person’s benefit. It may involve violence or threats, but it can also rely on deception, debt, dependency, control of documents, immigration status, accommodation, wages, transport, communication or access to support.

Form	Examples relevant to our work
Forced or compulsory labour	Work or services extracted under threat, coercion, withheld wages, debt, document retention, threats linked to immigration status or an inability to leave employment freely.
Human trafficking	Recruiting, moving, transferring, harbouring or receiving a person for exploitation, within the UK or across borders.
Domestic servitude	A person being controlled or exploited in a private household, including excessive work, confinement, withheld pay or restricted contact with others.
Debt bondage and recruitment exploitation	Recruitment fees, loans, inflated transport or accommodation charges, or deductions that trap a worker in dependency.
Forced criminality	A person being compelled to commit offences, including theft, fraud, drug-related activity or financial crime.
Sexual exploitation	A person being coerced, deceived or controlled for sexual gain.
Child exploitation	Any form of forced labour, trafficking, criminal exploitation, sexual exploitation or servitude involving a child.
Organised labour exploitation	Workers being controlled through threats, overcrowded accommodation, unlawful deductions, confiscated documents, bank account control or intimidation.

4. Risk assessment and priority risk areas

We use a risk-based approach. Risk does not mean that exploitation has occurred. It means that the nature of an activity, workforce arrangement, supplier, product or service requires greater scrutiny and stronger controls.

Our assessment considers the following factors:

- the labour intensity of the service or product and the use of low-paid, temporary, migrant, seasonal or agency labour
- the number of intermediaries and subcontracting layers between Tamney and the people performing the work
- the countries or regions in which goods are manufactured or labour is recruited

- whether workers depend on an employer or intermediary for immigration sponsorship, accommodation, transport, banking or access to documents
- pricing that appears unrealistically low or dependent on excessive working hours
- reports, complaints, whistleblowing information, audit findings or adverse media concerning the supplier or sector
- the supplier’s willingness and ability to explain its workforce arrangements and supply chain
- the vulnerability of people receiving services or workers who may have limited English, limited local support or fear of authorities
- the seriousness and immediacy of any indicators of control, coercion, exploitation or harm

Priority risk area	Why it matters	Tamney control
Recruitment intermediaries	Workers may be charged fees, misled about roles or controlled through debt, travel, documents or sponsorship.	Direct recruitment is preferred. Intermediaries are checked, terms are documented, worker feedback is sought and recruitment fees are prohibited.
International or migrant labour	Workers may fear losing immigration status or may depend heavily on a sponsor, recruiter or community contact.	Right to work is verified lawfully. Staff receive written terms, direct pay, confidential welfare access and protection from retaliation.
Agency and temporary labour	The employment chain may be less visible and workers may experience deductions, insecure hours or poor conditions.	Agencies must provide evidence of lawful employment, pay, right-to-work checks and modern slavery controls.
Accommodation and transport linked to work	Dependency can be used to control a person or create excessive deductions.	Any arrangement is separately risk assessed, transparent, voluntary and not used to prevent a worker leaving employment.
PPE, uniforms and manufactured consumables	Long global supply chains can conceal forced labour or unsafe conditions.	Higher-risk categories receive enhanced supplier questions, declarations and evidence checks.
People receiving care in private homes	Staff may encounter domestic servitude, trafficking, cuckooing, forced criminality or coercive control.	Safeguarding training, reporting pathways, factual recording and multi-agency referral arrangements apply.
Subcontracting	Unauthorised subcontracting can weaken visibility and accountability.	Subcontracting requires prior approval, equivalent standards and flow-down obligations.

5. Governance, accountability and policies

Kudzai Chibamu, Director and Registered Manager, has overall accountability for this statement and for ensuring that modern slavery risks are integrated into governance, safeguarding, workforce and procurement arrangements. Managers responsible for recruitment, staffing, purchasing, quality and safeguarding are accountable for implementing the controls relevant to their roles.

Our governance arrangements include:

- annual approval and publication of this statement
- modern slavery risks included within organisational risk assessment and management review
- escalation of serious concerns to the Director without delay
- quarterly review of relevant recruitment, workforce, safeguarding, supplier and whistleblowing information
- documented corrective actions with owners, deadlines and verification of completion

- co-operation with local authorities, police, CQC, commissioners, labour enforcement and other competent bodies
- retention of evidence demonstrating checks, decisions, referrals, actions and learning

This statement is supported by our Safeguarding Adults, Children and Young People Policy, Recruitment and Selection arrangements, Equality and Diversity Policy, Whistleblowing arrangements, Complaints procedure, Code of Conduct, Disciplinary procedure, Data Protection controls, Environmental and Sustainable Procurement controls and Quality Assurance, Governance and Continuous Improvement Policy.

6. Responsible recruitment and fair employment

We recognise that recruitment and employment practices are among the most important controls against labour exploitation. Our approach is based on free choice, transparent terms, lawful pay and working conditions, respect for personal documents and access to independent reporting routes.

- 1. No recruitment fees.** Workers must not be charged a fee for obtaining employment with Tamney. Where we use an agency or intermediary, we require it to confirm that it has not charged the worker prohibited or exploitative recruitment fees. Any concern about debt or fees is investigated promptly.
- 2. Identity and right-to-work checks.** We complete lawful pre-employment checks and verify the individual directly. Checks are not delegated blindly to an intermediary. Copies and records are handled securely and only for legitimate purposes.
- 3. Control of documents.** Tamney does not retain passports, biometric residence permits, identity documents, bank cards or personal phones as a condition of employment. Documents may be viewed or copied lawfully for a defined purpose, but originals remain under the worker's control.
- 4. Written terms and informed agreement.** Workers receive clear information about the role, place of work, pay, hours, travel, probation, deductions, notice, training and expected conduct. Material changes are explained and documented.
- 5. Pay and bank accounts.** Pay is made through lawful payroll arrangements. We check that salary is paid to an account controlled by the worker unless there is a legitimate, documented and worker-led reason otherwise. Payslips and authorised deductions are transparent.
- 6. Working time and freedom to leave.** We do not compel staff to work excessive hours, accept unwanted shifts or remain in employment through threats, withheld pay, debt, accommodation, immigration pressure or any other form of coercion. Notice provisions are lawful and do not remove the right to resign.
- 7. Confidential welfare contact.** Staff can raise concerns privately through management, supervision, grievance, safeguarding and whistleblowing routes. Managers remain alert to signs that a worker is being controlled by another person or cannot speak freely.
- 8. Agency and bank workers.** Before use, we assess the supplying organisation's employment model, right-to-work arrangements, pay practices, modern slavery controls and complaint routes. We reserve the right to speak directly and confidentially with workers.
- 9. Accommodation and transport.** Where work-related accommodation or transport is arranged by any party, the terms, costs and freedom of choice must be transparent. A worker must not be trapped by excessive charges, threats of homelessness or the loss of transport.
- 10. Recruitment warning signs.** We investigate inconsistent addresses, a third party controlling communications, identical bank details across workers, unexplained deductions, reluctance to speak alone, fearfulness, debt, document retention, overcrowded accommodation or a worker appearing unable to leave the arrangement.

7. Supplier and subcontractor due diligence

We expect suppliers, agencies, contractors and subcontractors to uphold the same fundamental standards. Our due diligence is proportionate. A low-risk local professional service will not require the same evidence as a labour provider or a supplier of goods manufactured through complex international supply chains.

Before appointment, and periodically thereafter where risk warrants it, we may require:

- legal identity, ownership, operating address and relevant registrations
- a modern slavery policy or statement, where applicable
- details of labour providers, subcontractors and manufacturing locations
- confirmation that workers are employed voluntarily, can leave with lawful notice and retain their own identity documents
- confirmation that recruitment fees, deposits, unlawful deductions and forced overtime are prohibited
- evidence of right-to-work, pay, working time, grievance and whistleblowing controls
- details of previous modern slavery allegations, investigations or enforcement action
- agreement to notify Tamney promptly of a material concern
- acceptance of audit, information, corrective action and termination provisions proportionate to the risk

Where due diligence identifies a weakness but no immediate harm, we may agree a time-limited improvement plan and monitor completion. Where there is credible evidence of exploitation, obstruction, dishonesty or continuing risk, we may suspend orders, prevent further worker deployment, escalate to authorities and terminate the relationship. Commercial continuity will not take priority over a person's safety.

Flow-down expectation

A supplier must not meet Tamney's standards only at its own premises while ignoring exploitation further down its supply chain. Higher-risk suppliers are expected to apply equivalent requirements to their labour providers, subcontractors and material suppliers.

8. Safeguarding people who may be exploited

Modern slavery is not only a procurement issue. Care staff enter private homes and may observe circumstances that are hidden from other services. A potential victim may be a person receiving care, relative, neighbour, domestic worker, staff member or another person encountered during service delivery.

Indicators may include restricted movement, another person speaking on the individual's behalf, fearfulness, unexplained injuries, poor living conditions, lack of personal possessions, inability to retain money or documents, excessive work, debt, threats, surveillance, overcrowding, unfamiliarity with the local area, or signs that a home is being used by others for exploitation or criminal activity.

Staff must not attempt to investigate, confront an alleged controller or place the person at greater risk. They must prioritise immediate safety, record facts, report internally and use the appropriate adult or child safeguarding, police and local authority pathway. Where the concern relates to regulated activity or the safety of a person using our service, the Registered Manager will also consider CQC notification and commissioner reporting.

For an adult, we will seek the person's views and consent wherever it is safe and practicable, while recognising that information may need to be shared without consent where there is immediate danger, coercion, a serious crime, risk to others, a child at risk or another lawful safeguarding basis. For a child, the child's welfare is paramount and referral must not be delayed while seeking parental agreement where doing so may increase risk.

9. Training, awareness and speaking up

Modern slavery awareness forms part of our safeguarding and ethical employment arrangements. Training and briefings are proportionate to role and include:

- the main forms of modern slavery and how exploitation can be concealed
- workforce and recruitment indicators, including debt, fees, document control and third-party influence
- signs that a person receiving care or another person in a household may be exploited
- how to respond safely to a disclosure and avoid leading questions or confrontation
- internal safeguarding, whistleblowing and management escalation routes
- when to contact police, local authority safeguarding services, the Modern Slavery and Exploitation Helpline or another competent authority
- confidentiality, lawful information sharing, factual recording and protection from retaliation
- supplier due diligence requirements for managers who purchase goods, commission services or approve labour providers

No employee will suffer retaliation for raising a genuine concern in good faith, even if the concern is not ultimately substantiated. Deliberately ignoring, concealing or participating in exploitation may result in disciplinary action and external referral.

10. Responding to concerns and supporting potential victims

Every concern will be treated seriously and assessed according to urgency, vulnerability and risk. Our response sequence is:

- 1. Protect.** If there is immediate danger, serious injury or a crime in progress, call 999. Do not confront the suspected exploiter if this may increase risk.
- 2. Listen and record.** Listen calmly, use the person's own words, record what was seen or heard, and avoid making promises that information will never be shared.
- 3. Escalate internally.** Notify the Registered Manager, safeguarding lead or on-call manager without delay. If the concern involves a senior manager, use the whistleblowing route and report externally where necessary.
- 4. Refer and report.** Contact the appropriate police, local authority safeguarding service or other competent body. The Modern Slavery and Exploitation Helpline may be contacted on 0800 0121 700. Police can be contacted on 101 for non-emergencies.
- 5. Support.** Consider immediate safety, medical needs, communication support, an interpreter, advocacy, safe contact arrangements, employment protection and access to specialist assistance.
- 6. Preserve evidence.** Keep records, communications, payment information, rota data, supplier details and other relevant evidence secure. Do not alert a suspected controller where this may compromise safety or an investigation.
- 7. Co-operate.** Work with authorised first responders and competent authorities. Where a National Referral Mechanism referral is appropriate, Tamney will support engagement with an authorised first responder and respect the applicable consent requirements.
- 8. Review and learn.** Complete a management review, update risk controls, consider employment and supplier action, notify regulators where required and track improvements to completion.

A person will not be penalised merely because exploitation affected their immigration, accommodation, bank account, attendance, documentation or ability to comply with normal workplace expectations. We will consider the circumstances, protect confidentiality and act in a trauma-informed and non-judgemental manner.

11. Monitoring effectiveness and performance measures

We will assess effectiveness through evidence rather than relying only on the existence of policies. Performance information will be reviewed at least annually and more frequently where risk warrants it.

Measure	Expected evidence
Training completion	Percentage of staff completing safeguarding and modern slavery awareness within required timescales.
Recruitment compliance	Completed identity, right-to-work, reference, contract, payroll and welfare checks for sampled staff files.
Recruiter and agency assurance	Percentage of active labour providers with current due diligence, declarations and worker complaint routes.
Supplier risk assessment	Percentage of material suppliers risk rated and higher-risk suppliers subject to enhanced assurance.
Worker voice	Themes from supervision, confidential check-ins, surveys, grievances and exit discussions.
Concerns and referrals	Number, nature, source and timeliness of concerns, safeguarding referrals and external reports.
Corrective action	Actions completed by deadline, evidence of effectiveness and any recurring weakness.
Pay and deductions	Audit findings concerning wages, payslips, bank details, authorised deductions and working hours.
Contract compliance	Supplier acceptance of ethical labour, audit, notification and subcontracting requirements.
Annual governance review	Director approval, updated risk assessment, statement publication and documented priorities.

The number of reported concerns is not interpreted in isolation. An increase may indicate greater awareness and confidence to speak up rather than worsening practice. We will examine seriousness, source, timeliness, outcomes, recurrence and whether people felt safe to report.

12. 2026 to 2027 improvement commitments

During the reporting period we will strengthen our approach through the following actions:

Commitment	Evidence and target
Formal modern slavery risk register	Maintain a documented register covering workforce, recruitment, service-user and supply-chain risks, reviewed at least quarterly.
Supplier classification	Risk-rate all material active suppliers and identify categories requiring enhanced due diligence.

Commitment	Evidence and target
Recruiter and agency assurance	Complete a standard questionnaire and evidence check before new labour providers are approved.
Contract clauses	Include proportionate anti-slavery, audit, notification, subcontracting and termination provisions in new or renewed higher-risk agreements.
Workforce awareness	Provide modern slavery content within induction and refresher safeguarding arrangements and retain completion evidence.
Worker welfare checks	Use supervision and confidential check-ins to identify recruitment debt, document control, coercion, excessive hours or third-party influence.
Management dashboard	Review training, recruitment checks, supplier assurance, reports and actions through quality governance.
Website transparency	Keep this statement accessible, review it annually and publish a revised statement following Director approval.
Learning review	Review every credible concern for immediate protection, root causes, policy implications and preventive action.

Continuous improvement

Modern slavery risk cannot be managed by a one-off declaration. Tamney Healthcare Ltd will use worker feedback, safeguarding intelligence, supplier information, audits, regulatory guidance and lessons from incidents to improve controls throughout the year.

13. Approval and declaration

This statement has been approved by the Director of Tamney Healthcare Ltd. It is authorised for publication on the company website and will be reviewed annually, or sooner where there is a material legal, organisational, workforce, safeguarding or supply-chain change.

We confirm our commitment to preventing modern slavery and human trafficking within our operations and supply chains, to protecting people who may be at risk, and to acting promptly where concerns arise.

Signed



Name	Kudzai Chibamu
Position	Director and Registered Manager
Date	17 June 2026

Appendix A. Modern slavery risk indicators

One sign alone may have an innocent explanation. A combination of signs, an inconsistent account or a person appearing unable to speak freely should increase concern. Staff must report concerns rather than attempting to prove exploitation themselves.

Area	Possible indicators
Freedom and control	The person appears unable to leave work or accommodation, is always accompanied, has movements monitored, or another person answers for them.
Documents and communication	Someone else holds identity documents, bank cards or phone. The person does not know their address, employer or contract details.
Pay and debt	Unexplained deductions, no access to wages, shared bank accounts controlled by another person, recruitment debt, or fear linked to money owed.
Working conditions	Excessive hours, no rest, unsafe work, threats for refusing shifts, or a large difference between promised and actual work.
Living conditions	Overcrowded, unsafe or employer-controlled accommodation, inability to leave, or threats of homelessness.
Behaviour and wellbeing	Fear, withdrawal, rehearsed answers, visible injuries, malnutrition, exhaustion, anxiety or reluctance to engage alone.
Recruitment	Fees, deception about the job, travel arranged by an unknown third party, documents withheld, or instructions to mislead authorities.
Care and community setting	Domestic servitude, cuckooing, forced criminality, unfamiliar people controlling a home, or a person being exploited by relatives or associates.
Supplier behaviour	Refusal to provide workforce information, suspiciously low pricing, repeated subcontracting, inconsistent records, or adverse labour allegations.

Appendix B. Supplier assurance requirements

The following requirements may be applied according to risk, contract value, labour model and supply-chain complexity.

Requirement	Supplier expectation
Legal compliance	Comply with applicable modern slavery, employment, immigration, pay, working-time, health and safety and equality requirements.
Voluntary labour	Ensure all work is freely chosen and workers may leave employment with lawful notice.
No fees or deposits	Do not charge exploitative recruitment fees, require deposits or create debt bondage.
Documents	Do not retain passports, work permits, bank cards or personal communications devices as a condition of work.

Requirement	Supplier expectation
Pay and deductions	Pay lawfully, provide transparent payslips and make only lawful, agreed deductions.
Subcontractors	Apply equivalent standards to labour providers, subcontractors and material suppliers.
Worker voice	Provide safe grievance and whistleblowing routes, without retaliation.
Notification	Inform Tamney promptly of credible allegations, investigations, enforcement action or material control failures.
Evidence and audit	Provide proportionate information and permit verification where required.
Corrective action	Address weaknesses within agreed timescales and protect affected workers.
Termination	Accept that serious, dishonest or unresolved non-compliance may lead to suspension or termination.

Reference framework

- Modern Slavery Act 2015, including section 54 on transparency in supply chains.
- Home Office, Transparency in Supply Chains: a Practical Guide.
- Home Office statutory guidance, Modern Slavery: How to Identify and Support Victims.
- Care Act 2014 and Care and Support Statutory Guidance, including adult safeguarding responsibilities.
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, including Regulation 13.
- Home Office guidance on right-to-work checks and sponsor compliance, where applicable.
- Government guidance on reporting labour exploitation and modern slavery.

Public contact information

If someone is in immediate danger, call 999. For a non-emergency police report, call 101. The Modern Slavery and Exploitation Helpline can be contacted on 0800 0121 700. Tamney staff must also follow internal safeguarding and whistleblowing procedures.