

VOLUNTARY CORPORATE STATEMENT

Modern Slavery and Human Trafficking Statement

Financial year 1 March 2026 – 28 Feb 2027

Reporting period	1 March 2026 to 28 February 2027
Reporting status	Voluntary statement prepared with regard to section 54 of the Modern Slavery Act 2015
Board approval	06 August 2026
Next annual review	No later than 31 March 2027

Our commitment. PH Healthcare Solutions Ltd has zero tolerance for slavery, servitude, forced or compulsory labour, human trafficking, debt bondage, deceptive recruitment, unlawful child labour and any other exploitation that a person cannot freely refuse or leave. We will act with care, transparency and accountability to reduce these risks in our own operations and supply chains.

1. Purpose and voluntary status

This statement explains the approach taken by PH Healthcare Solutions Ltd to identify, prevent, mitigate and respond to modern slavery risks in connection with its business and supply chains during the financial year from 1 March 2026 to 28 February 2027. It also sets out the improvements we intend to make during 2026/27.

Based on its turnover for the reporting period, PH Healthcare Solutions Ltd is not currently an organisation required to publish a statement under section 54 of the Modern Slavery Act 2015. We are publishing voluntarily because modern slavery can affect organisations of every size, particularly where people are recruited into care work or where goods and services pass through less visible supply-chain tiers. This statement has therefore been structured with regard to section 54(5) and the Home Office Transparency in Supply Chains guidance updated in December 2025.

We do not claim that risk can be eliminated or give an absolute guarantee that every tier of every supply chain is free from exploitation. Our responsibility is to understand the risks, apply controls proportionate to our size and influence, respond properly when concerns arise, and improve our approach each year.

2. Our organisation, services and supply chains

PH Healthcare Solutions Ltd is a private company limited by shares, registered in England and Wales under company number 13902819. We are based in Sheffield and provide personalised care services and healthcare staffing support. Our services include hourly care, overnight care and live-in care, and our workforce may include care workers, healthcare assistants and registered professionals engaged to support people and health or care settings.

Our business is people-led and our most important supply chain is the labour and recruitment chain through which workers find, accept and undertake work. Our supporting supply chains are comparatively short and principally relate to recruitment and vetting, training, payroll and professional services, uniforms and personal protective equipment, technology and telecommunications, office supplies, property and facilities, cleaning, transport and other operational services. Some goods, particularly garments, PPE and electronic equipment, may have global manufacturing tiers beyond our direct suppliers.

We recognise that being a small purchaser does not remove responsibility. It does, however, affect the degree of leverage and visibility we have beyond direct suppliers. We therefore focus our strongest controls on people, labour intermediaries and the suppliers most closely connected with worker welfare, while progressively improving our understanding of other priority supply chains.

3. Governance and accountability

Ultimate responsibility for this statement and the company's response to modern slavery rests with the Board. Rehema Ssekitoleko, Director and Nominated Individual, provides senior oversight. Operational responsibility is shared with those managing recruitment, workforce compliance, safeguarding, quality assurance, purchasing and service delivery.

1. **The Director** sets expectations, considers significant risks and concerns, approves remedial action and reviews annual progress.
2. **Managers and recruitment personnel** apply safer-recruitment controls, remain alert to indicators of coercion or exploitation, listen to workers and escalate concerns.
3. **Those purchasing goods or services** consider supplier legitimacy, labour-related risk and any warning signs when selecting or renewing priority suppliers.
4. **Every worker** is expected to follow safeguarding and reporting arrangements and may raise a genuine concern without fear of retaliation.

Modern slavery will be considered through the company's existing governance arrangements, including safeguarding, recruitment, whistleblowing, grievance, equality, disciplinary, quality and risk-management

processes. A concern will not be treated only as a supplier or employment-compliance issue where a person may need protection or specialist support.

4. Policies and minimum standards

The following principles form our minimum standard for our own operations and the behaviour we expect from recruitment partners, contractors and suppliers. They are interpreted consistently with applicable employment, immigration, equality, safeguarding, health and safety, procurement and data-protection requirements.

5. Employment must be freely chosen. No person should be threatened, coerced, deceived or prevented from leaving lawful employment in accordance with their contract.
6. Workers must not be charged a fee or deposit to obtain work with PH Healthcare Solutions Ltd. We will not knowingly use a recruitment channel that transfers prohibited recruitment costs to workers.
7. Workers must retain control of their passport, identity documents, bank account and personal property. Original documents may be viewed for lawful verification but must not be retained as a means of control.
8. Pay, working hours, deductions, leave and other key terms must be lawful, transparent and communicated in a form the worker can understand.
9. Unlawful child labour is prohibited. All workers must meet the lawful age and role requirements for the work they undertake.
10. Discrimination, intimidation, harassment and retaliation against a person who raises a genuine concern are not tolerated.
11. Suppliers are expected to apply equivalent standards in their own operations and to cooperate with proportionate enquiries, corrective action and lawful investigations.

5. Risk assessment

We assess risk by considering the vulnerability of people, the use of intermediaries, the transparency of pay and deductions, geographic and product risk, the length and complexity of a supply chain, the degree of our leverage, and any warning signs or credible intelligence. A low spend does not automatically mean low human impact.

Risk area	Why it matters to our business	Our proportionate response
Recruitment and migrant-worker vulnerability	Care workers may face recruitment debt, misleading job offers, dependency on an intermediary or sponsor, document retention, coercion or fear about immigration status.	Direct checks with the worker, no worker-paid placement fees or deposits, worker control of identity documents and bank accounts, clear terms, welfare conversations and escalation routes.

Risk area	Why it matters to our business	Our proportionate response
Temporary, agency or subcontracted labour	Distance between the worker and the end provider can reduce visibility of pay, deductions, working hours and recruitment practices.	Use approved providers, verify legitimacy and employment arrangements, prohibit onward supply without consent, and request evidence where risk is elevated.
Pay, scheduling, travel and accommodation	Unlawful deductions, excessive hours, dependency on tied transport or accommodation and pressure to accept work can increase vulnerability.	Transparent pay and deductions, accurate time records, lawful rest, accessible rotas, welfare checks and freedom to raise concerns or decline additional work without retaliation.
Goods and support services	PPE, uniforms, electronics, cleaning, facilities and office supplies can contain lower tiers or overseas production that are less visible to a small purchaser.	Risk-based supplier selection, preference for reputable and traceable suppliers, contractual expectations, targeted enquiries and escalation where credible concerns arise.
Care and safeguarding environments	Workers may encounter people experiencing exploitation, or exploitation indicators may overlap with other safeguarding concerns.	Safeguarding awareness, prompt internal escalation, referral to statutory agencies where appropriate, and a person-centred response that prioritises safety and informed support.

6. Due diligence in recruitment and employment

Our first line of prevention is safe and transparent recruitment. Controls are designed not only to establish legal eligibility and suitability for care work, but also to create opportunities for a worker to disclose pressure, debt, document retention, misleading promises or control by another person.

12. Confirm the individual's identity and conduct the appropriate right-to-work check directly and lawfully.
Where relevant to the role, verify qualifications, professional registration, references and Disclosure and Barring Service status.
13. Explain the role, location, expected hours, pay basis, deductions, holiday arrangements and material terms before work begins, and provide written terms or an agreement appropriate to the employment relationship.
14. Check that the worker controls their own contact details, identity documents and bank account, and is able to speak privately with the company where a concern or inconsistency arises.
15. Do not request or accept a placement fee, work-finding deposit or payment from a worker. Investigate credible information that a third party has charged a worker for access to a PH Healthcare Solutions Ltd role.
16. Maintain accurate records of work and pay, monitor patterns such as excessive hours or unusual control by another person, and provide accessible ways to question pay, rotas or deductions.

17. Where migrant or sponsored workers are engaged, avoid treating immigration status as a reason to dismiss a welfare concern. Provide information about reporting routes and escalate suspected exploitation appropriately.

Recruitment documentation alone cannot prove that exploitation is absent. Managers should use professional curiosity, private and respectful conversation, and continuing welfare oversight. Where language or communication is a barrier, appropriate support or interpretation should be considered without relying on a person who may be exercising control over the worker.

7. Supplier and contractor due diligence

Our supplier due diligence is risk-based. The company will direct the greatest scrutiny towards labour providers, recruitment agencies, subcontracted care, cleaning and facilities services, and suppliers of PPE, uniforms and technology where labour or manufacturing tiers may be less transparent.

18. verify the supplier's legal identity, business address and suitability before appointment, proportionate to the nature and value of the relationship
19. make the company's prohibition of modern slavery, worker-paid recruitment fees and retaliation clear to priority suppliers
20. seek information on recruitment, employment, subcontracting and supply-chain controls where risk is heightened
21. avoid unauthorised onward subcontracting or labour supply that obscures who employs, pays or controls workers
22. record and assess credible complaints, audit findings, adverse media or unexplained inconsistencies, and require time-bound corrective action where appropriate
23. reserve the ability to suspend or end a relationship for serious or unresolved breaches, while considering whether abrupt termination could expose affected workers to further harm

Commercial pressure can itself create risk. Where practicable, purchasing decisions should avoid unrealistic pricing, payment delays, last-minute scheduling or requirements that could encourage a supplier to underpay workers, use undeclared labour or impose excessive hours.

8. Reporting, escalation and victim-centred remediation

A worker, service user, family member, supplier or member of the public may raise a concern directly with a manager or the Director, by telephone on 07961 156242 or 0114 551 1492, or by email to info@ph-healthcaresolutions.co.uk. Communications should be marked for the attention of the Director where confidentiality is requested. Genuine concerns may be raised without retaliation. Confidentiality will be respected as far as possible, subject to safeguarding and legal duties.

Where a concern suggests immediate danger or a crime in progress, emergency services should be contacted on 999. Non-emergency concerns may be reported to the police on 101 or to the UK Modern Slavery and Exploitation Helpline on 08000 121 700. Where relevant, we will also consider local-authority safeguarding procedures, notification to the Care Quality Commission and cooperation with an authorised first responder for the National Referral Mechanism.

Our response will place the safety, wishes and welfare of the potentially affected person at the centre. We will not require an untrained manager to investigate beyond their competence or confront a suspected exploiter where doing so may increase danger. We will preserve appropriate records, obtain specialist or statutory advice, protect confidentiality, prevent retaliation and cooperate with lawful enquiries.

If harm is connected with our actions or business relationships, we will use our influence to stop the harm and support appropriate remedy. This may include correcting pay or deductions, changing working arrangements, providing safe routes to support, requiring supplier corrective action, suspending unsafe activity or ending a relationship. Ending a contract will not be an automatic first response if it is likely to worsen a person's vulnerability or remove access to remedy.

9. Training and awareness

Awareness will be proportionate to responsibility. All workers should understand the company's zero-tolerance position, common indicators, internal reporting routes and the need for prompt safeguarding escalation. Directors, managers, recruiters and those engaging priority suppliers require enhanced learning on responsible recruitment, recruitment fees, document retention, coercion, migrant-worker vulnerability, lawful handling of disclosures and victim-centred response.

Training and briefings will be recorded and refreshed in response to legal guidance, incidents, audit findings or changes in the company's risk profile. The company will use authoritative resources, including Home Office modern slavery awareness materials and relevant health and care safeguarding learning.

10. Monitoring effectiveness

This is our first formal voluntary statement. During the next period we will move from policy commitment to a more measurable assurance framework. Results, exceptions, concerns and corrective actions will be reviewed by the Director and summarised in the next annual statement, while respecting personal data and the safety of affected people.

Measure	How it will be assessed	2026/27 target
Safe recruitment	New starters with identity, right-to-work, terms and pay checks completed before assignment	Target: 100%

Measure	How it will be assessed	2026/27 target
No recruitment fees	Recruitment partners and labour intermediaries confirming that workers pay no placement fee or deposit	Target: 100%
Training	Directors, managers and recruitment staff completing enhanced modern slavery awareness	Target: 100%
Supplier assurance	Priority labour, PPE, uniform, cleaning and technology suppliers receiving proportionate screening	Target: 100% of priority suppliers
Response	Concerns logged, risk-triaged and escalated immediately where urgent or within one working day	Target: 100%
Governance	Modern slavery risk, concerns, actions and learning reviewed by the Director	Target: at least quarterly

A target of 100% is an accountability standard, not a claim that risk has been eliminated. Any missed control, concern or adverse finding will be investigated, corrected and used to improve the system. We will report meaningful progress, including areas where work remains incomplete.

11. Priorities for 2026/27

24. Maintain a documented modern slavery risk assessment covering labour and priority non-labour suppliers.
25. Introduce a proportionate supplier declaration and modern slavery clauses for priority new or renewed contracts.
26. Deliver and record enhanced awareness for directors, managers and recruitment personnel, supported by concise information for all workers.
27. Strengthen worker-welfare conversations so concerns about fees, debt, documents, pay, accommodation, transport or control can be raised privately.
28. Create a central record of supplier checks, concerns, decisions, corrective action and learning, with quarterly director review.
29. Prepare the next statement soon after the financial year ending 28 February 2027 and publish it no later than 31 March 2027.

12. Approval, publication and annual review

Before publication, this statement must be approved by the Board of PH Healthcare Solutions Ltd and signed by a director. Once approved, it will be published in a prominent and accessible location on the company website. Previous statements should remain available so that progress can be compared over time. The company may also add the approved statement to the voluntary government Modern Slavery Statement Registry.

The reporting cycle follows the company's financial year, which ends on the last day of February. The statement will be reviewed annually and, in line with government guidance, the updated statement should be approved and published as soon as practicable and no later than six months after the financial year end. It may be reviewed earlier following a significant incident, legal or regulatory change, material change to the business, or evidence that controls are not effective.

Board approval date: 06 August 2026

Signed on behalf of the Board: Rehema Ssekitoleko

Rehema Ssekitoleko

Director and Nominated Individual

An approval-ready digital name mark has been supplied separately. It must only be inserted after Rehema Ssekitoleko has personally authorised its use for this statement.

Reference basis

[Modern Slavery Act 2015, section 54](#)

[Home Office: Transparency in supply chains - a practical guide \(updated 1 December 2025\)](#)

[GOV.UK: Publish an annual modern slavery statement](#)

[GOV.UK: Modern Slavery Statement Registry](#)