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## Introduction

This statement outlines THE FIN CONSORTIUM's efforts to comprehensively assess potential modern slavery risks associated with its operations and implement measures aimed at eradicating slavery and human trafficking from its own operations and supply chains. The statement pertains to activities undertaken during the financial year (1 April 2023 to 31 March 2024).

As a participant in the Health and Social Care sector, The FIN Consortium Ltd acknowledges its duty to take a robust stance against slavery and human trafficking. The organization is fully dedicated to preventing these atrocities in its corporate activities and ensuring that its supply chains remain untainted by slavery and human trafficking.

## Organisational Structure and Supply Chains

### About The FIN Consortium

The Future is Now (FIN) Healthcare Consortium Ltd is a conglomerate of Healthcare & Social Care Workforce Solutions, Data and Healthcare Skill Development services dedicated to providing innovative and accessible healthcare solutions to individuals and communities. Our Vision is to obliterate waiting time in health and social care services. Our team of experts work tirelessly to develop cutting-edge technologies and services that empower patients and clients to take control of their health and well-being and access care with ease.

We are committed to delivering the highest quality care standards and improving outcomes for patients and clients across the globe. At The FIN Consortium, the future of healthcare is happening now.

### Key Services Offered:

- Integrated Healthcare System
- Workforce (Recruitment) Solutions and Services
- Health & Social Care Skill Development & Training
- Data Analysis & Business Intelligence Services

We currently operate in the United Kingdom and intend to expand our operations to Europe in the future.

## Our Approach

At The FIN Consortium, we are dedicated to preventing modern slavery and human trafficking within our organization and throughout our supply chains. We believe that transparency,

accountability, and collaboration are essential in addressing these issues effectively. Our approach to combating modern slavery is guided by the following principles:

The FIN Consortium condemns all forms of modern slavery and human trafficking and is committed to eradicating these abuses from our operations and supply chains. We will not tolerate any form of forced labour, child labour, or exploitation within our organization or among our suppliers and business partners.

We recognize that combating modern slavery and human trafficking is a complex and ongoing challenge that requires sustained effort and collaboration. We are dedicated to working tirelessly to uphold the dignity, rights, and well-being of all individuals affected by these crimes.

This Modern Slavery Statement reflects our commitment to transparency and accountability in our efforts to combat modern slavery and human trafficking. We will review and update this statement regularly to ensure that it remains relevant and effective.

## Compliance with Laws and Regulations:

We comply with all applicable laws and regulations related to modern slavery and human trafficking in the countries where we operate. We expect our employees, contractors, and business partners to uphold these standards and to report any suspected instances of modern slavery or human trafficking.

## Risk Assessment

We conduct regular risk assessments to identify and evaluate the potential risks of modern slavery and human trafficking in our operations and supply chains. We also perform due diligence on our suppliers and business partners to ensure that they share our commitment to ethical business practices.

## Policies and Procedures

We have established policies and procedures to prevent and address modern slavery and human trafficking within our organization. These include a Code of Conduct that outlines our expectations for ethical behaviour, as well as whistleblower mechanisms for reporting concerns confidentially.

- **Whistleblowing policy.** The FIN Consortium encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential reporting form.
- **Employee Code of Conduct.** Our code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Subcontractors (Supplier/Procurement) code of conduct:** The FIN Consortium Ltd is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet

the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment/Agency workers policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

## Due diligence

The FIN CONSORTIUM undertakes due diligence when recruiting new staff and workforce to various buyers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

Our recruitment process consists of the following stages:

1. Receipt of CV
2. Completion of application form
3. Formal face-to-face interview
4. Identity verification checks
5. Right to work verification
6. Verification of employment history & references
7. Validation of professional registration and qualifications with the relevant regulatory body (e.g., GMC/NMC/SSSC)
8. Health assessment checks for work suitability
9. English language competency assessment
10. Safeguarding check through the Disclosure and Barring Service (DBS)/PVG
11. Verification of statutory, mandatory, and clinical/core skills training
12. Declaration of agreement with company policies and procedures through handbook declaration
13. Participation in appraisal and revalidation processes, where required.

At each stage, thorough checks and assessments are conducted to ensure compliance with regulatory requirements and suitability for the role.

We also take due diligence in our supply chain by:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.

- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- conducting audits or assessments of all suppliers which have a greater degree of focus on slavery and human trafficking where general risks are identified.

## Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, The FIN CONSORTIUM is:

- requiring HR staff and supply chain managers to have completed training on modern slavery within 6 months.
- developing a system for supply chain verification whereby The FIN Consortium evaluates potential suppliers before they enter the supply chain; and

## Training

We provide training and awareness programs to our employees and supply chain partners to educate them about the risks of modern slavery and human trafficking and to empower them to identify and respond to potential issues effectively.

The FIN Consortium and its operational businesses require all HR staff and supply chain managers to complete training on modern slavery as a module within our staff training programme powered by SGIL Hub. It is an online training course that must be completed within 3 – 6 months of joining our team.

Our modern slavery training covers:

- our business's values and practices, which influence our recruitment and supply chain conditions, and which are designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below the country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

## Awareness-raising programme

As well as training staff, the organisation frequently raise awareness of modern slavery issues by putting up posters across the organisation's premises and circulating a series of emails to staff.

The posters and emails explain to staff:

- the basic principles of the Modern Slavery Act 2015.
- how we can identify and prevent slavery and human trafficking.
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

### **Collaboration and Engagement:**

We collaborate with government agencies, non-governmental organizations (NGOs), industry associations, and other stakeholders to address the root causes of modern slavery and human trafficking and to promote ethical business practices across our industry.

### **Continuous Improvement:**

We continuously monitor and evaluate our efforts to combat modern slavery and human trafficking, seeking opportunities for improvement and innovation. We are committed to implementing best practices and adopting industry standards to enhance our effectiveness in this area.

*This statement has been approved by The FIN CONSORTIUM's board of directors, who will review and update it annually.*



**Isaac Ajayi**  
Managing Director  
Date: 5 April 2024