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Modern Slavery and Human Trafficking Statement

September 2026

www.ivolve.care

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

It sets out the steps ivolve Care & Support has taken, and continues to take, to ensure that modern slavery and human trafficking are not taking place within our business or in our supply chains.

We believe that everyone has the right to live and work freely, and we take our responsibility to prevent modern slavery seriously. We are committed to transparency in our own business and in how we tackle modern slavery across our supply chains.

We recognise that the risk of modern slavery and human trafficking is present in our sector, and that our responsibility extends beyond our own workforce to the workers of those we engage with.

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About ivolve

ivolve Care & Support provides support and care for adults with learning disabilities, autism, acquired brain injury (ABI), and mental health needs.

Our purpose is to support people to flourish in a place they call home, living fulfilling lives with dignity, respect, and personal choice.

We operate a range of nursing, residential and supported living services, day centres, and outreach programmes tailored to individual needs.

We are dedicated to providing high-quality, person-centred care while upholding the highest ethical standards in every aspect of our operations.

Our Commitment

We believe that everyone has the right to live and work freely, and we take seriously our responsibility to prevent modern slavery and human trafficking.

We are committed to transparency in our own business and in how we tackle modern slavery across our supply chains, in line with our disclosure obligations under the Modern Slavery Act 2015.

We recognise that this responsibility extends beyond our own workforce to the workers of those we engage with, and that the risk of exploitation is present in the sectors in which we operate.

We expect the same high standards from all our contractors, suppliers and other business partners, and we will not knowingly work with any organisation that fails to meet them

We recognise the risk of forced labour in recruitment within our sector, and we use digital processes and tracking systems to minimise and control that risk. We also recognise that the risk is highest for those in lower-paid, temporary and agency roles, and that recruitment practices further down our supply chain can affect workers we do not directly employ.

Between April 2025 and March 2026, we onboarded over 1,000 compliant colleagues into ivolve. We also completed over 900 Disclosure and Barring Service (DBS) renewals.

We use agency resources on a limited basis, through a supplier that ensures the relevant checks are completed to our standards. Our agency supplier is required to confirm that all workers it supplies have the right to work in the UK, have undergone the same background checks as our directly employed colleagues, and have not been charged any fee for their placement.
We keep the use of agency resource under review, and any increase in reliance on agency workers is considered against the risk it may present.

Our People – Wellbeing & Financial Support

A safe and supportive environment is essential to protecting our colleagues, sustaining their wellbeing, and reducing the risk of exploitation. Every colleague deserves to be treated fairly, and to have access to the resources, support and opportunities they need to flourish. We recognise that fair treatment is not only a matter of principle, but a practical safeguard: colleagues who are well supported, informed of their rights and able to speak up are far less vulnerable to exploitation of any kind.

Over the past 12 months we have strengthened our financial wellbeing support. We extended our offering through a trusted supplier to provide pay advancing, alongside our existing financial advice service. This means colleagues can access practical tools, guidance and services designed to help them manage their money effectively and build lasting financial resilience. We know that financial pressure can heighten vulnerability to exploitation, so this support forms part of our wider approach to protecting our workforce, not simply an employee benefit. We continue to review these provisions to ensure they meet colleagues' needs as circumstances change.

Our ivolve extras platform offers considerably more than financial support and savings. It includes a 'Mind' section, which complements our existing Employee Assistance Programme (EAP), providing colleagues with further resources and guidance on mental health and emotional wellbeing.

Colleague voice, internal networks, forums and feedback channels are central to ivolve's purpose, and they promote open, honest and transparent communication. We want colleagues to feel heard, supported and psychologically safe, and to know that raising a concern will be taken seriously. Where colleagues tell us something is not working, we act on it, and we continue to develop these channels so that they remain accessible to everyone, including those who may not feel able to raise an issue through their line manager.

Our Policies

ivolve has several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Recruitment Policy — Requires that all employees are legally entitled to work in the UK, and that they undergo rigorous background checks, including identity verification, references and DBS checks, before they commence employment. The policy also sets out our expectation that no worker is charged a fee for their recruitment, directly or indirectly.

Safeguarding Policy — Sets out our commitment to protecting vulnerable adults from all forms of abuse, including exploitation and harm. It is supported by mandatory training that enables colleagues to recognise the indicators of abuse and to understand how to report concerns.

Procurement Policy — Requires due diligence checks on all suppliers and contractors before engagement, and provides for those relationships to be kept under review for changes in risk profile once they are in place

Equality, Diversity, & Inclusion Policy - Our Equality, Diversity and Inclusion Policy exists to ensure that every colleague is treated with dignity and fairness, and that decisions about recruitment, progression and pay are made on merit alone — which matters for modern slavery because exploitation thrives where people are excluded, isolated or treated as interchangeable

Whistleblowing Policy — Provides a clear and confidential route for colleagues, and for others working in or with our organisation, to report concerns without fear of reprisal. Concerns are investigated, and we do not tolerate any form of detriment against someone who raises one in good faith. Genuine concerns will be taken seriously, investigated as appropriate and raised without fear of detrimental treatment. It applies across ivolve and includes all colleagues, workers, and contractors.

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Technology and Employment Controls

ivolve relies on technology to reinforce our employment and payroll controls and to reduce the risk of exploitation. This includes electronic right-to-work verification and electronic payroll systems, which help ensure that required checks are carried out consistently, by the right people, and to the same standard every time.

Our operational colleagues, who make up the majority of ivolve's core workforce, also use a sector-specific workforce management platform that governs their work, shifts and remuneration. Because it links directly to how and when colleagues are paid, this platform provides a further control against the risk of unpaid or underpaid work.

Together, these controls protect the integrity of how we recruit and employ people, and they sit within our broader commitment to safeguarding workers and preventing exploitation.

Our HR Information System (HRIS) gives team members and managers a single, central touch point with the People Team, including people services, compliance and our regional people support roles. Users can manage their employment and pay-related queries directly through a secure ticketing system, which helps ensure concerns are prioritised and resolved without unnecessary delay.

The result is a clearer and more auditable route for employment, pay, right-to-work and other HR matters — including those that may surface indicators of exploitation. Where a case involves case management or safeguarding, it continues to be handled through the appropriate specialist process.

Our Supply Chains

Our supply chains include the procurement of goods and services required for the delivery of care, such as food, medical supplies, agency staff, cleaning, facilities management, and property maintenance. We recognise that some of these sectors — in particular food production, cleaning and agency staffing — carry a higher risk of modern slavery than others, reflecting the prevalence of low-paid, temporary and subcontracted labour within them.

To mitigate these risks, we:

- Require new suppliers to complete due diligence questionnaires and provide evidence of their own anti-slavery policies and practices before they are engaged. This could extend to confirmation of their approach to recruitment, worker pay and the use of subcontracted labour, and we will not proceed with a supplier where the responses raise unresolved concerns.

- Monitor ongoing supplier relationships for any red flags or changes in risk profile. This includes keeping under review the geographic location of supply, the labour model used, and any changes in ownership or subcontracting arrangements that could alter the risk a supplier presents.

- Review our supplier base periodically to identify where risk is concentrated, so that our due diligence and monitoring effort is directed towards the areas where it is most needed.

- Escalate and act on concerns where they arise, working with the supplier to address the issue where it is capable of resolution, and ending the relationship where it is not.

- Provide a route for our colleagues and supply chain workers to raise concerns, so that potential issues can be identified and addressed at the earliest opportunity.

We review this approach periodically and update our processes where we identify gaps or where the risk landscape changes

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Due Diligence Processes & Reporting Concerns

We undertake robust due diligence when recruiting employees and engaging suppliers. This includes:

- Verifying the identity and right to work of all employees and agency workers, using original documentation and, where appropriate, electronic verification, before they commence work.
- Checking the legitimacy of suppliers and third-party contractors, including their registration status, ownership and any history of regulatory or employment breaches, before we engage them.
- Reviewing these checks periodically thereafter, so that they remain accurate as circumstances change.

All colleagues are expected to play their part in identifying, reporting and responding to concerns, and managers are expected to act on any concern brought to them.

We encourage anyone who suspects that someone is a victim of modern slavery, or who has concerns about practices within our organisation or our supply chain, to report this. Concerns can be raised with a line manager, through our whistleblowing procedures, or directly with our safeguarding or HR teams.

In addition, we provide a range of listening forums and run anonymous colleague surveys, giving people further opportunities to come forward with a disclosure. We recognise that some of those affected may be reluctant or unable to report directly, and these channels are intended to reach them, including our EDI learning & forums.

All concerns are taken seriously and will be investigated promptly and thoroughly. We will act to protect anyone at risk, involve the relevant authorities where appropriate, and provide feedback to the person who raised the concern where we are able to do so.

This statement is published for financial year ending 31 March 2026 by ivolve Care Holdings Limited, in respect of the trading entity of Heathcotes M Limited trading as ivolve Care & Support.

This statement was approved by the Board of Directors on 3rd August 2026.

Tim Davies – Chief Executive Officer 

Neil Robinson – Chief Finance Of 

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