Modern Slavery and Human Trafficking Policy

Riverstone Healthcare Partners Ltd
Website policy and public commitment
Prepared: 13 October 2026
Effective date: 15/10/2026
Policy owner: COO
Approved by: Valerie Kureya
Approval date: 14/10/2026
Next review: 15/10/2026

Review-ready draft. This is a policy commitment, not a verified annual statement of actions taken under section 54 of the Modern Slavery Act 2015. Complete approval and contact fields and confirm implementation before publication.

1. Our commitment

Riverstone Healthcare Partners Ltd ("Riverstone", "we", "us", "our") is committed to preventing modern slavery, human trafficking and labour exploitation in its operations and supply chains and to protecting people who may be affected.

We will not knowingly tolerate forced labour, servitude, trafficking or exploitative recruitment. We recognise that a commitment alone does not eliminate risk: prevention requires proportionate checks, safe reporting, action and continuing review.

This policy states the standards Riverstone adopts. It does not claim that every supplier has been audited or that no exploitation has occurred.

2. Scope and meaning

This policy applies to directors, managers, employees, agency personnel, contractors and volunteers acting for Riverstone. We expect suppliers, recruitment partners and subcontractors to uphold equivalent standards.

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking. Exploitation may involve coercion, threats, deception, debt bondage, abuse of vulnerability or control over movement, documents or earnings.

A concern may involve a worker, service user, family member or someone in the supply chain. Not every employment dispute is modern slavery, but concerning patterns must be assessed rather than dismissed.

3. Legal framework and annual reporting

We will comply with applicable modern-slavery, employment, safeguarding and recruitment requirements, including the Modern Slavery Act 2015.

The Board will assess annually whether Riverstone meets the conditions for mandatory section 54 reporting, including the applicable £36 million turnover threshold calculated under the relevant rules. Riverstone's turnover and group position have not been verified for this draft.

If a statutory annual statement is required, Riverstone will prepare a separate statement describing the actual steps taken during the relevant financial year, obtain Board approval and a director's signature, and publish a prominent homepage link. This standing policy does not replace that statement.

If reporting is not mandatory, Riverstone may voluntarily publish an evidence-based annual statement without suggesting that the statutory threshold has been met.

4. Accountability

The Board is responsible for oversight, approving this policy and reviewing material risks and actions.

The designated policy owner coordinates risk assessment, implementation and reporting. Managers and those responsible for HR, recruitment, procurement and safeguarding must apply the relevant controls.

Personnel must raise concerns promptly and cooperate with appropriate enquiries. Concerns involving a manager must be capable of escalation to another senior person or an external authority.

Internal alternative escalation contact: complaints@riverstonehealthcarepartners.com

5. Care-sector risk assessment

Risk assessments will consider recruitment agencies and labour intermediaries; international recruitment and migration vulnerability; subcontracted services; employer-linked accommodation or transport; unexplained deductions; and supply chains for goods and services.

Potentially relevant supplies include personal protective equipment, uniforms, cleaning, laundry, transport, catering, equipment and facilities services where Riverstone uses them. This list does not assert that all are currently contracted.

We will prioritise higher-risk arrangements, review material changes and document actions rather than assume that a supplier declaration proves compliance.

6. Employment and ethical recruitment standards

Riverstone will provide clear employment terms, information about pay, hours and deductions, and a means to raise concerns. Workers must receive legally required pay and rest and must be free from coercion and unlawful restrictions on leaving employment.

Workers must retain control of their passports and identity documents. Checks or temporary handling must have a legitimate purpose and must not prevent access or be used as leverage.

Riverstone will not charge or permit recruitment partners to charge candidates work-finding or recruitment-service fees. We will assess the full recruitment chain, including overseas intermediaries where used.

Where international recruitment occurs, Riverstone will follow the applicable health and social care recruitment code, including relevant country restrictions and permitted exceptions, and assess recruitment partners appropriately.

Costs legally payable by an employer or sponsor must not be transferred to workers. Any permitted repayment provision for genuine worker-related expenses must be lawful, transparent, evidenced, proportionate, time-limited and flexible; it must not trap workers in debt or prevent them from leaving.

Right-to-work and other recruitment checks must not be used to intimidate workers or substitute for checks on exploitation. Accommodation arrangements, deductions and agency terms will be assessed where relevant.

7. Supplier and agency due diligence

Before engagement and at appropriate intervals, Riverstone will conduct proportionate risk-based checks. These may include legal identity, ownership, recruitment methods, labour sourcing, worker-paid fees, subcontracting, policy commitments and relevant adverse information.

For higher-risk arrangements, further evidence or discussions with workers may be appropriate. Supplier terms should require lawful labour practices, disclosure of material concerns, cooperation with enquiries and corrective action, with appropriate contractual remedies.

We will not rely solely on the existence of a policy or certification. Where a supplier fails to meet standards, we will consider protective remediation, suspension or termination, taking account of worker safety and continuity of care.

8. Indicators of concern

Indicators may include a person appearing frightened or controlled; inability to speak privately; another person controlling documents or bank accounts; excessive debt or recruitment fees; threats relating to immigration status; little or no pay; unexplained deductions; forced overtime; inability to leave work or accommodation; or unsafe and overcrowded living conditions.

Indicators are not proof. Staff must avoid assumptions based on nationality, ethnicity or migration status and use a sensitive, evidence-based approach.

9. Reporting and immediate safety

If someone is in immediate danger, call 999. For non-emergency police reporting, call 101. For advice or to report suspected exploitation, contact the Modern Slavery & Exploitation Helpline on 08000 121 700.

Internal concerns may be raised with a manager, the safeguarding lead or the policy owner. General contact: enquiries@riverstonehealthcare.co.uk; telephone: +44 20 3757 1147. These are not emergency channels.

Where a concern involves the person who normally receives reports, use the alternative contact or an appropriate external route. Anonymous reports will be considered, although limited information may restrict follow-up.

Do not confront a suspected exploiter, alert them unnecessarily or conduct an informal investigation that could endanger someone. Preserve relevant information safely and record facts rather than assumptions.

Confidentiality will be respected as far as possible but cannot be guaranteed where lawful disclosure is needed to protect someone or involve authorities.

10. Safeguarding, referrals and support

Riverstone will assess immediate safety, follow its adult or child safeguarding procedure and seek advice from appropriate safeguarding bodies or police. Safety concerns must not be delayed while waiting for internal approval.

Formal National Referral Mechanism referrals are made by designated first-responder organisations. Riverstone must not assume it has first-responder status and will coordinate with an appropriate organisation.

Adults generally require informed consent for an NRM referral. Consent is not required for a child's referral. Urgent protection and other lawful safeguarding disclosures are separate decisions; a refusal of NRM consent does not automatically prevent all protective action.

We will aim to provide a private, safe opportunity to speak, an independent interpreter where needed and information about specialist support. Avoid promises of confidentiality, immigration outcomes or compensation that Riverstone cannot guarantee.

We will consider proportionate remedies within our control, such as correcting unlawful deductions or recruitment practices, protecting affected workers and ensuring continuity of safe care.

11. Non-retaliation and fair treatment

Riverstone prohibits retaliation against anyone who raises a concern honestly, seeks help or cooperates with an appropriate investigation. A report need not be substantiated for the person to receive this protection.

Personnel may use applicable whistleblowing and external reporting routes. Knowingly malicious allegations may be addressed fairly under relevant procedures, but an unproven concern must not be treated as malicious merely because it cannot be confirmed.

12. Training and awareness

Relevant induction and refresher training will cover exploitation indicators, ethical recruitment, safeguarding, safe reporting and responsibilities. Additional training will be provided for higher-risk roles such as HR, procurement, recruitment and safeguarding.

Completion, understanding and training needs will be monitored. The policy should be accessible to workers, including through suitable language or format support where needed.

13. Information handling

Concerns and case records will be handled securely with access limited to those who need them. Collection, sharing and retention must have an appropriate lawful basis and, where needed, additional conditions for sensitive or criminal-offence information.

Records will be retained under approved schedules and legal-hold requirements. Staff must not submit unnecessary sensitive case details through public website forms.

14. Monitoring and improvement

The Board will review proportionate indicators such as recruitment-chain checks, high-risk supplier assessments, training completion, worker feedback, concerns raised, response times and completion of corrective actions.

A low number of reports is not itself proof of low risk. Review should consider whether workers feel safe to report.

Any annual statement will distinguish completed actions from future plans and include verified information rather than unsupported assurances.

15. Breaches, review and publication

Breaches by personnel will be addressed through fair procedures and may result in disciplinary action. Supplier breaches may lead to corrective requirements, suspension, termination or reporting where appropriate.

This policy will be reviewed at least annually and after material incidents, legal changes or significant changes in recruitment or supply arrangements. Publication must follow approval.

Board approval date: 14/10/2026
Director approving publication: Hati Gonese

Signature or recorded approval: 
Date: 14/10/2026

16. Contact

Riverstone Healthcare Partners Ltd
Business/contact address: 4 Cottesbrooke Close, Daventry, NN11 8BF, United Kingdom
Email: enquiries@riverstonehealthcare.co.uk
Telephone: +44 20 3757 1147
Website: https://riverstonehealthcare.co.uk