Modern Slavery, Forced Labour and Child Labour Statement

FIRST VOLUNTARY STATEMENT

Prepared with reference to the UK Home Office International Reporting Template on Modern Slavery, Forced Labour and Child Labour (updated 1 December 2025).

Document control	Details
Organisation	Gutu Mirror Limited
Document status	Approved first voluntary statement
Date prepared	1 November 2026
Reporting basis	Initial position and planned actions; first annual progress review proposed November 2027
Approval and signatory	Virginia Holmes, Director and Nominated Individual

Our commitment

Gutu Mirror Limited is committed to preventing modern slavery, human trafficking, forced labour and child labour, both in our own operations and in our supply chains. We know that exploitation can happen in health and social care, particularly through recruitment, labour supply arrangements, subcontracting and the goods and services we buy. We'll take a proportionate, risk-based approach to preventing, spotting, escalating and putting right any problems we find.

This is our first voluntary statement. As we understand it, our annual turnover is below £36 million, so we aren't currently required to publish a statement under section 54 of the Modern Slavery Act 2015. We've chosen to write one anyway because we want to be open and to do the right thing. Throughout, we've been careful to separate what we already have in place, as described in our existing documents, from what we're still introducing. We won't present planned actions as though they're complete.

Organisation structure, operations and supply chains

Gutu Mirror Limited is a UK adult domiciliary care provider, supporting people in their own homes. Our Business Continuity Plan names Virginia Holmes as Director and Nominated Individual and Lauren Ison as Registered Care Manager. Our organisation chart sets out our management structure: directors, registered care management, deputy management, care coordination, team support management, senior care workers and care workers.

Under this statement, we'll be looking closely at where we buy from and who we depend on. The main areas are recruitment and employment services, any external care staffing agencies, training services, digital care

management and IT support, personal protective equipment, office supplies and other operational services. This is a list of the supplier categories that could matter most; we haven't yet built a complete, mapped supplier register.

Our Business Continuity Plan mentions our capability to recruit internationally. We recognise that any overseas recruitment route needs extra care and scrutiny, so that no worker ends up paying recruitment fees, falling into debt bondage, being threatened, having their documents held, or being stopped from leaving their job.

Policies and governance

Virginia Holmes will provide senior oversight of this statement, and Lauren Ison will coordinate its implementation and reporting, supported by our management team. Our Business Continuity Plan already sets out how we manage and escalate issues, but that alone doesn't mean every modern slavery control described below has already been documented or tested.

Our plan is to build modern slavery risks into our recruitment, safeguarding, whistleblowing, supplier selection, incident reporting and staff induction procedures. We'll review our relevant policies, employment documents and supplier terms and change them where needed, so they clearly prohibit forced labour, trafficking, exploitative recruitment fees, coercion and child labour. Anyone who raises a concern in good faith must be able to do so without fear of retaliation.

Risk assessment and management

We'll create a modern slavery risk register during our initial implementation period. We'll review it at least once a year, and whenever our recruitment arrangements or suppliers change. Our priority risks, and the controls we propose, are set out below.

Risk area	Potential exposure	Proposed prevention / response
Overseas recruitment and sponsorship	Recruitment fees, debt bondage, misinformation, dependency on sponsor	Review recruiter terms, confirm fee arrangements, privately check workers' experience and access to documents; prohibit unlawful charges and coercion.
Agency and subcontracted labour	Opaque employment chains, underpayment, excessive hours	Verify supplier identity, registration where relevant, and pay and employment arrangements; require that credible concerns are escalated.
Direct workforce	Threats, withheld wages or documents, inability to raise concerns	Check recruitment records, right to work, pay and hours; provide confidential ways to raise concerns and investigate them fairly.
Goods and service suppliers	Labour exploitation in less visible upstream supply chains	Prioritise due diligence by geography, sector and labour intensity; seek extra assurance where risks are higher.

GUTU MIRROR

Due diligence, response and remediation

We'll set up a proportionate due diligence checklist for suppliers and employment. The checks we propose include confirming a business's identity, contractual responsibility, whether recruitment intermediaries are legitimate, employment and pay arrangements, how workers can raise concerns, and suitable contractual commitments for higher-risk suppliers.

If a concern is raised, the manager who receives it will put the person's immediate safety first, keep information secure, and quickly pass it to the Registered Care Manager and Director. Where appropriate, we'll contact the police, local safeguarding services or other competent authorities. We'll avoid any response that could put a potentially exploited worker at further risk. We won't treat suspected exploitation as just a routine disciplinary or supplier performance matter. We'll record the corrective action we take and think about how to put things right for the people affected, getting specialist advice where we need it.

In an emergency, call 999. For non-emergency suspicions, you can contact the police on 101 or the UK Modern Slavery & Exploitation Helpline on 08000 121 700. These routes sit alongside our internal safeguarding escalation; they don't replace it.

Training and capacity building

We'll cover the signs of modern slavery and exploitation in our staff induction and refresher training, tailored to people's roles. Managers involved in recruitment and supplier engagement will get additional guidance on recruitment fees, vulnerability linked to sponsorship, warning signs, confidential conversations and escalating concerns safely.

We'll keep records of attendance and competence. As this is a new initiative, we're not claiming that dedicated modern slavery training has already reached all our staff; our training register will give us an accurate starting point for completion.

Measuring effectiveness and continuous improvement

As this is our first voluntary statement, we don't have any past modern slavery performance figures to share. We'll use the indicators below to monitor how well our plans are being put into practice and whether they work, and we'll report our first results at our first annual review.

Indicator	Initial objective
Recruitment controls	100% of new direct and agency recruitment routes reviewed using a documented checklist from implementation.
Priority supplier assurance	Identify all material recruitment and care staffing suppliers and record proportion receiving risk-based checks.
Staff awareness	Record modern slavery training completion and aim for 100% of relevant existing staff to complete initial training by 31 March 2027.
Reporting and resolution	Log concerns, actions and closure decisions; review trends, remembering that zero reports isn't proof of zero risk.
Governance	Management review of the risk register and progress at least annually, with earlier review after any material incident.

Implementation milestones and other relevant information

Target date	Action and accountability
By 31 December 2026	Virginia Holmes and Lauren Ison to approve the risk owner, prepare a supplier and recruitment inventory, and complete a policy gap review.
By 31 January 2027	Introduce risk-based employment and supplier due diligence checklist, escalation pathway and modern slavery risk register.
By 31 March 2027	Complete initial targeted staff training and review high-risk recruitment and staffing arrangements; retain attendance and review records.
By 30 April 2027	Review the effectiveness of the controls and address any evidence or implementation gaps.
November 2027	Publish our first annual progress update, covering what we've measured, concerns handled, corrective actions and revised objectives.

We'll review this statement every year, and sooner if a significant risk or event arises. It isn't a guarantee that Gutu Mirror or every one of our suppliers is free from exploitation. Instead, it sets out the proportionate, accountable steps we're taking to identify and tackle risk.

Director approval and signature

This voluntary statement has been reviewed and approved by our Director, and is signed below.

Name	Virginia Holmes
Position	Director and Nominated Individual, Gutu Mirror Limited
Signature	
Approval date	1 November 2026
Next review	November 2027 (or earlier following a material change)

Government reference: https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/international-reporting-template-on-modern-slavery-forced-labour-and-child-labour-accessible