

MODERN SLAVERY STATEMENT

This statement is made in relation to HCRG Care Group, which falls within the scope of section 54 of the Modern Slavery Act 2015. The statement sets out the steps which have been taken in the financial year ending 31 March 2024 to help ensure modern slavery and human trafficking are not taking place in our supply chains or any part of our business.

Who we are

HCRG Care Group provides more than 400 frontline health and social care services, partnering with the National Health Service (NHS) and local authorities across England. The organisation employs approximately 5,000 people.

Each year our organisation changes significantly with the end of some contracts and the start of new contracts involving the transfer of operational health and care services. Consequently, new suppliers, supply chains and ways of working are inherited along with those contracts which naturally affects our progress, in proportional terms, in this statement.

Our supply chains

Our supply chain includes professional services providers, NHS Trusts, NHS Foundation Trusts, social enterprises, medical equipment suppliers and office equipment suppliers. As a consequence of the nature of our business the vast majority of spend is on medical consumables; one of our biggest suppliers is NHS Supply Chain Limited, a company owned by the UK Government's Secretary of State Health and Social Care. More than 99% of our annual procurement spend is with companies based in the UK and Europe.

We share the majority of our supply chain with the state-operated NHS, and all organisations supplying the NHS are subject to the NHS Code of Conduct on Ethics and Labour which includes aspects looking at preventing modern slavery. As an NHS supplier ourselves, we are also subject to this code.

While a very small proportion of spend, from time to time, we procure marketing collateral including t-shirts, pens, caps and 'promotional items'. These are always sourced from British Promotional Merchandise Association Chartered (<http://bpma.co.uk/>) suppliers, ensuring appropriate standards of employment and wages are upheld. We have continued to take steps to reduce the usage of promotional materials across the Group, whilst also limiting the product range available to only eco-friendly and sustainable items.

Our policy

It continues to be a priority for us to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. We consider that modern slavery and human trafficking are completely unacceptable whether they are in our supply chain or any other part of our business, and the communities where we work. We regularly review our policies and procedures in order to ensure we have effective systems which lessen the risk of modern slavery and human trafficking taking place anywhere in our supply chains.

We have an Anti-Slavery and Human Trafficking policy in place which sets out our approach to ensuring our supply chain does not contain modern slavery and our Safeguarding and Whistleblowing policies provide colleagues with guidance on how to report their concerns.

Where we engage a new supplier, we work to ensure HCRG Care Group's standard Terms and Conditions – which contain provisions ensuring compliance with our Anti-Slavery and Human Trafficking policy – are in place rather than the supplier's own terms, wherever practicable.

We encourage and require our suppliers to proactively manage the risk of modern slavery in their own supply chains.

Safeguarding Training

Our frontline teams are trained to an appropriate level in Safeguarding for their role, and this training – which must be completed every 3 years – includes material on identifying the signs of modern slavery and human trafficking among the people who use the services we run.

In 23/24, we provided a range of e-learning modules specific to types of roles across the organisation. These are SG Levels 1, 2 and 3 safeguarding training programs in which education on modern slavery is embedded, reinforcing our modern slavery policies, part of our annual Statutory and Mandatory Training Programme .

Colleagues completing SG level 1

Individuals who are not healthcare professionals and will never treat and/or support patients, clients or service users will only work directly with HCRG Care Group colleagues.

This includes individuals working within Central services, administrative staff in hospitals, between others.

Colleagues completing SG level 2

Non-Registered practitioners who directly treat and/or support the treatment of only adult patients/clients/service user's health and care needs.

This includes **ONLY** non-registered practitioners such as HCAs, Phlebotomists working specifically and only with adult patient/clients or service users. Individuals in this category could potentially see children (for example, a parent going for an appointment and bringing their child along) but they will never directly treat and or support the treatment of children's health and care needs.

Colleagues completing SG level 3

Individuals who directly treat and/or support the treatment of both adults and children patients, clients or service users' health and care needs.

This may include nurses, AHPs, paramedics, HCAs, paediatricians or children nurses for example

We continue to review compliance through our annual appraisal process and to promote the importance of safeguarding knowledge. The completion percentages over FY 23-24 are as follows;

SG level 1 – March 2024 – 72.3%

SG level 2 - March 2024 – 89.8%

SG level 3 – March 2024 – 74.3%

In addition, we take part in a number of joint initiatives with local authorities and other healthcare providers to further increase our ability to identify potential modern slavery and human trafficking among our service user populations.

Sub-contracted services

As part of the delivery of health and care services we employ the services of sub-contractors including for the provision of cleaning, driving and delivery services which may be considered at higher risk of modern slavery. These suppliers are expected to comply with our standard terms and conditions, including provisions preventing modern slavery.

Training our colleagues

We offer a range of guidance and training to all of our colleagues in the business on our Purchase to Pay system, best practice procurement and assisting with minimising the risk of modern slavery in our supply chains.

Our procurement team supports each of our Business Units with, among other things, procurement training and development. During the year we provided additional support and training across all of our Services covering all aspects of our Purchase to Pay function.

Due diligence processes

We seek to minimise the number of suppliers we work with in order to allow us to work more closely with those we do. New suppliers added to our system are managed by the procurement team in line with our policies and processes. We continuously update the new supplier process to ensure it meets with internal and external policy requirements.

Our central procurement team ensure that all our suppliers are aware of our terms and conditions. New suppliers are required to confirm they have read, understood and comply with our terms and conditions which cover labour issues.

Under our approach to contract management, we have identified our key list of critical suppliers and we undertake a robust due diligence process of those suppliers' ongoing compliance with our standard terms and conditions. This includes reviewing their business continuity arrangements, financial standing and adherence to policies and processes and ensuring their direct suppliers are also taking steps to minimise the risk of modern slavery in their business and supply chain.

Procurement

During 2023-24, we replaced our end to end Purchase to Pay (p2p) system and streamlined our supplier database, including by, where possible, procuring services at a national rather than regional or business unit-specific level. This ensured we utilised as few suppliers as possible, helping us to enhance our partnerships with the core group of suppliers. This improved our understanding of their business and further assured us of their work around modern slavery and safeguarding. Embedded into the new p2p system is a supplier management module, for which we collate key documents, including those related to supplier modern slavery policies and action plans.

We have also undertaken a review of our procurement policy and communications with the aim of further encouraging colleagues across the organisation to involve the procurement team as early as possible when seeking to engage a new supplier, increasing the team's ability to ensure our terms and conditions are used. We are committed to helping the NHS work towards realising its sustainability goals. We have a Carbon Reduction Plan achieving Net Zero emissions (Scope 1, 2 and 3) by 2045. We also have an aspiration to be net zero on scope 1 and 2 emissions by 2030.

We have completed the Evergreen Sustainable Supplier Assessment and have been awarded Level 2: Comprehensive net zero targets and reporting for carbon emissions, with a structured approach to addressing modern slavery and driving social value.

Non-compliance

If we find an existing supplier is non-compliant with our policies or code of conduct or provides us with inadequate information to assure us of their compliance with our terms and conditions we will work with them to ensure that they are able to provide us with the information and, if appropriate, to improve their performance.

If a supplier is found to be unable to meet our terms and conditions or policies, we will review our relationship with them as soon as practicable. During 2023-24 we are pleased that we did not encounter any occasions where we needed to consider terminating our relationship.

Next Year

During 24/25 we will continue to build on the supplier document database, and further increase our interaction with core suppliers regarding their own supply chains and their commitment to eradicating modern slavery. We will continue to drive the highest possible standards and levels of education and training throughout the company, working in partnership with all stakeholders to ensure continuous improvement.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending March 31 2024.