

# Modern Slavery Act 2015

## Modern slavery and human trafficking statement

### Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

HUC is committed to improving our practices to combat modern slavery and human trafficking.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes HUC's modern slavery and human trafficking statement for the financial year ending March 2025.**

### Organisational structure

We are a Social Enterprise providing commissioned Primary and Urgent Healthcare Services to cover 4 million people.

HUC's core business is to deliver highly responsive and effective integrated healthcare for patients with urgent but non-life-threatening conditions. We currently provide our Integrated Urgent Care Services (IUC), which includes NHS111, Clinical Assessment Service (CAS) and Out of Hours GP services across Cambridge and Peterborough, Luton and Bedfordshire, Hertfordshire and West Essex, and Somerset. Working in partnership with Kernow Health we will also be providing IUC services to Cornwall.

Patients can speak to a wide range of clinicians within our CAS, including pharmacists, and NHS111 also enables access to specialist mental health services. This range of specialist advice means that more patients can make one phone call to get the 'right service, right place, first time.'

HUC's other services include Primary Care GP Practices, Dental Access and treatment Services, Urgent Treatment Centres and Minor Injury units. In East and North Herts, we also provide the Acute in Hours Visiting Service (AIHVS) and an early Intervention Vehicle Service as part of the IUC.

HUC currently employs approximately 1,600 staff and has an annual turnover of over £80m.

### Our policies on modern slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are modern slavery free, we continually review our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to:

- act ethically and with integrity in all our business relationships.
- implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

HUC has in place strong policies, due diligence and risk assessment processes pertaining to risk management, safeguarding, whistleblowing, and complaints. This is to ensure that where modern slavery is suspected, this can be managed sensitively and appropriately with the correct safeguards in

place. HUC recognises the responsibilities we have towards our service users, carers, independent contractors, and staff. We also encourage both contractors and staff to report any concerns. Our Vulnerable Adults and Safeguarding Children policies have been developed in accordance with national and local safeguarding legislation and guidance. They include guidance on recognising a suspected human trafficking victim. Our recently revised safeguarding training includes information on modern slavery awareness.

In the year ahead HUC is committed to further developing an Environmental Social Governance strategy. This strategy will seek to introduce new processes to ensure that our largest suppliers are further scrutinised in relation to their modern slavery prevention processes. HUC will also seek to use KPIs to measure how effective we are in ensuring slavery and trafficking is not part of the business.

## **Due diligence processes for modern slavery and human trafficking**

As part of our initiative to identify and mitigate risk of modern slavery and human trafficking in our organisation and our supply chain we:

- adhere to the National NHS Employment Checks/Standards. These include checks regarding employees' UK addresses, the right to work in the UK and obtaining suitable references. We also ensure agencies are on our approved suppliers list.
- ensure our staff receive fair pay rates and contractual terms through our Workforce and Remuneration Committees
- ensure all procurement and purchasing is conducted in line with HUC policies.
- protect whistle blowers and encourage contractors and staff to report concerns via the commissioning of a new independent champion, via The Guardian Service
- as part of the rollout of our new Environmental Social Governance strategy, we expect companies we engage with to ensure their goods, materials and labour-related supply chains fully comply with the Modern Slavery Act 2015 and are transparent, accountable, and auditable. This will form part of new and renewal procurement contracting processes, with companies being requested to show evidence of this.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide and will continue to provide training to our staff.

The Modern Slavery Act 2015 and its explanatory notes are available at:

<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

The Board of Directors has considered and approved this statement and will continue to support the requirements of the legislation.

## **Requirement for annual review of this statement**

This statement will be reviewed on an annual basis to ensure it reflects the work HUC undertakes in improving our practices to combat modern slavery and human trafficking.

**MOONY NIJJAR**  
**DIRECTOR OF FINANCE & CORPORATE SERVICE**

**Date: 31<sup>st</sup> March 2025**