



Modern Slavery Statement

This statement is made in relation to the Modern Slavery Act 2015 and sets out the steps that HC-One has taken and is continuing to take to ensure that modern slavery and/or human trafficking is not taking place within our business or wider supply chain. We will not knowingly trade or partner with any organisation which is involved in modern slavery or human trafficking.

Modern slavery encompasses slavery, servitude, human trafficking, and forced or compulsory labour, 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. HC-One has a zero-tolerance approach to any form of modern slavery.

We are committed to acting ethically, with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery from taking place within the organisation.

Our Business

At HC-One, we strive to be the first choice for those we care for, their families, colleagues and commissioners in the communities we serve.

With almost 300 homes across England, Scotland and Wales, HC-One supports more people in elderly care settings in Britain than any other provider and has a team of dedicated colleagues who make up the largest care and nursing workforce outside the NHS.

HC-One brings together specialisms in dementia care, nursing and frailty to best meet the circumstances, conditions and choices of individuals and to support them to lead their best lives.

Our Policies

We have a number of internal policies, procedures, and partnership services, to ensure that we are conducting business in an ethical and transparent manner. Our policies and procedures are regularly monitored and reviewed. HC-One has a zero-tolerance approach to any form of modern slavery.

The key policies, procedures and partnership services that contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chains are:

Employment Practices - we offer an e-learning module for all colleagues on modern slavery awareness. We continue to operate robust safe recruitment procedures, including conducting thorough Right to Work in the UK checks for all colleagues to safeguard against human trafficking and/or individuals being forced to work against their will. Additionally, we ensure that all colleague wages are at least national minimum wage with all colleagues having the potential within two years of employment or sooner to earn the Real Living Wage. Wherever possible, we make certain that working hours comply with national requirements with particular consideration to working time regulations, and health and safety regulations. We also offer flexible working opportunities, and our talent acquisition process strives to represent the diverse market we serve.

Anti-Harassment and Bullying Policy – the Anti-Harassment and Bullying Policy sets out the organisation's commitment to providing a working environment free from harassment, bullying, discrimination, and victimisation. It also seeks to ensure all colleagues and business partners are treated and treat others with dignity and respect. We investigate, record, and manage any reported cases where things have gone wrong, when an undesirable experience is raised or observed, and/or where malpractice is reported.

Employee Assistance Programme – Life Management – we work in partnership with AXA PPP Healthcare to provide an Employee Assistance Programme (EAP). This is a confidential service that all HC-One colleagues, and their families can access for independent and confidential guidance and support on issues ranging from domestic matters, financial matters, and overall wellbeing matters. The Employee Assistance Programme ensures that colleagues receive the emotional as well as practical support they need and points them in the direction of any further help relevant to their enquiry.

Whistleblowing Procedure – the procedure sets out how colleagues can report any issues of concern or wrongdoing. It seeks to inform and re-assure all colleagues that they can raise concerns confidentially either with their manager, their supervisor, or member of the operational/management team about how other colleagues are being treated or practices within our business or supply chain, without fear of reprisal. The policy outlines our zero-tolerance approach to retaliation.

SeeHearSpeakUp – we work in partnership with the SeeHearSpeakUp Service which is an external and independent global whistleblowing service. The service allows colleagues who may not feel comfortable reporting concerns internally within the organisation to report matters externally in a secure and confidential manner without fear of reprisal. The service operates 24 hours a day, 365 days a year and can offer translation services for over 200 languages.

Supplier Code of Conduct - corporate integrity, responsible sourcing and the safety and wellbeing of workers in the countries where we do business are of paramount importance to HC-One. These core principles are reflected in the Supplier Code of Conduct, which establishes the minimum standards that must be met by any entity that supplies products or services to HC-One.

Our Suppliers

HC-One operates a supplier process which ensures that all suppliers perform in line with HC-One terms and conditions, along with maintaining a preferred supplier list through a "closed" eProcurement system which has been in operation since May 2018. We conduct due diligence on all suppliers before placing them on our preferred supplier list.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- No child or forced labour will be utilised.
- They abide by local legislation including national minimum wage and working time regulations.

HC-One continues to operate by the principles of this statement and maintains its zero-tolerance approach towards modern slavery. All suppliers and contractors continue to be bound by HC-One policies and procedures which support our commitment to ethical and transparent operations.

Our Performance Indicators

The effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain are indicated as follows:

- Three potential allegations pertaining to the possibility of modern slavery were received from colleagues in 2022/2023; we took these potential allegations very seriously and each of these were fully investigated with no findings of slavery. In addition, no reports have been received from the public or law enforcement agencies to indicate that modern slavery practices have been identified within our organisation.
- Where cases, or allegations, of slavery or forced labour are identified within our supply chain, we will investigate any concerns thoroughly. There have been no such cases or allegations in our Financial Year 2022/2023.

Our Focus for 2024

- Set up a Modern Slavery Working Group to assess, monitor and mitigate risks relating to modern slavery and human trafficking within the organisation, with individual departments taking specific actions where appropriate to the level of risk.
- To continue to offer colleague training and policy awareness via our Modern Slavery Awareness e-learning module to raise colleagues' awareness of modern slavery, and ensure colleagues involved in procurement activity are aware of and follow the modern slavery procurement guidance.
- To ensure that colleagues involved in the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

- Implement a new Human Rights Policy and undertake the communications strategy for updating the business.
- To continue to work with international recruitment agency partners to ensure that they are aware of our modern slavery and human trafficking statement and ethos.
- To continue to undertake enhanced due diligence on our key suppliers to enable us to make better judgements on transactions and the integrity of our supply chain.
- To maintain our close partnership with the SeeHearSpeakUp service. We will continue to listen, learn and improve by thoroughly investigating all whistleblowing cases reported by colleagues directly to the organisation or via SeeHearSpeakUp. Particular emphasis will be placed on finding out what the information gleaned through these mechanisms tells us with regards to our objective and drive for transparency and ethical behaviors throughout HC-One.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes HC-One Slavery and Human Trafficking statement for the financial year ending 2022/2023.

Approval for this statement:

This statement was approved by the Board of Directors on 20/05/2024

Name: James Tugendhat, Chief Executive Officer

A handwritten signature in grey ink, appearing to read 'James Tugendhat', with a stylized, flowing script.

Signature:

Date: 20/05/2024