



Modern Slavery Statement

2023

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Modern Slavery Statement

This statement has been published in accordance with the Modern Slavery Act 2015.

It provides an update on the progress that Care Unbound Limited (trading name Here) have made during the financial year ending 31 March 2023, and will continue to make, to prevent modern slavery in our business and supply chain.

This Modern Slavery statement was presented to and adopted by the Board on 7th July 2023.

Signed:



Lesley Jay, FCA
Finance Director





About Here

Care Unbound Ltd (aka "Here") is a UK registered company limited by shares. It is set up as a social enterprise so that any surpluses are reinvested in the business. It has no subsidiaries or parent but does hold a 50% corporate ownership in Yma it's Welsh cousin. Here is majority owned by it's employees.

Here operates in the UK only and we employ around 300 people including 115 on casual contracts. The majority of our services operate throughout the year, except our COVID vaccination service which is seasonal in Spring and Autumn.

Since the pandemic, many staff have been able to adopt a hybrid working pattern spending only some of their time in our main office in Brighton, or in clinic space around Sussex.

**Our purpose is to create exceptional care
for everyone**

Here was founded in 2008 with the aim of finding new ways to deliver healthcare. Today we bring this work to life through outstanding, innovative services with tangible benefits to individuals and communities. At our heart is a commitment to putting patients at the centre of everything we do.

Our expertise lies in designing and delivering health care that works for all of us, flexing to meet individual needs and circumstances. We don't shy away from change and we are passionate about learning and doing things better. We may not have all the answers but we think that many can be found in the collective leadership of patients and clinicians, health and care, public bodies, local communities and social enterprise collaborating to become more than the sum of their parts.

Our Values

We believe that our values as a social enterprise are foundational to our approach to preventing modern slavery in our organisation and supply chains.

Our Beliefs



True care is a way of living that creates meaning between us all.



We have a right to take control of our lives.



It takes courage to step forward and effect change.
The capacity to lead is within us all.



Every interaction can be powerful if we choose to engage consciously.
We know the ripples from these moments can go on to create profoundly positive change.



Care is something we can choose to show for ourselves and each other at any time.
Care is not exclusive to an appointment or a medical intervention.



Our Approach

Here recognise that we have a responsibility to take a robust approach to prevent modern slavery: labour exploitation, domestic servitude, criminal exploitation and sexual exploitation. We are committed to ensuring that we act ethically and with integrity in all our relationships and using all reasonable endeavours to ensure that there is no modern slavery in our own business or supply chains.

Everyone who works at Here shares responsibility for the organisation's anti-modern slavery initiatives and this work is led jointly by our Safeguarding Lead and Freedom to Speak Up Lead.

Our approach is underpinned by our purpose and values which are reflected in the relevant training and policies. We test the effectiveness through our staff survey. We have identified that two specific operational areas enable us to minimise the risks: supply chain management and our recruitment practices.

To support to this, we also have independent verification that we are doing what we say we are doing, provided by three external bodies: an audit every year by financial accountants; an annual audit on our policies and practices by anti-crime specialists, TIAA.; and monitoring and inspection by the Care Quality Commission (CQC). Reports and action plans from these external bodies are reported up to Board level.

We have appointed the Head of People Teams and Culture supported by the Finance Director to be responsible for anti-slavery and human trafficking. Our Finance Director is our designated Board member responsible for production of this statement.

Increased risk factors for 2022/23

- Here growing in size has increased the complexity of our business, the number of employees we have, and the range of suppliers that we deal with.
- Cost of living pressures has increased the possibility of financial crime and exploitation.

New approach for 2022/23

Here has decided to go further than the Modern Slavery Act 2015 and has implemented some of the recommendations undertaken by the Government's independent review of the Act in 2019. In particular, we are adopting from this year on:

- the recommendations for ensuring transparency in supply chains for the entirety of our supply chain.
- referring to the statement in our annual reports so that we embed the importance of this in our business.
- having a designated board member who is personally accountable for the production of the modern slavery statement.
- dating our statement to clearly state over which 12-month period it applies.

Our Training

Our first line of defence against modern slavery is increasing staff awareness of what it is, what red flags to look out for, and what to do if they have any suspicions or evidence.

On our internal website, the Hub, we have resources to explain to our people what modern slavery is referring to the Stronger Together website.

Here has a training policy which sets out the relevant statutory and mandatory training for colleagues in order to provide the highest quality of care to our patients and minimise risk to services.

The training modules relevant for modern slavery are:

- 'Safeguarding' training: all Here staff are required to complete Safeguarding training at appropriate levels which familiarises colleagues with the principles of the Care Act (2014) and includes modern slavery as a form of abuse.
- NEW in May 2023: 'Identifying and Supporting Victims of Modern Slavery' training: all clinicians are mandated to complete this training module every three years, this helps frontline healthcare staff to identify victims of modern slavery and take appropriate action to address their health and safety needs.

The Finance Director continues to remain updated on best practice and legislative changes to the Modern Slavery Act via training and updates through her membership of the ICAEW.

KPIs for FY22/23

Training module	% completed 2022/23
Safeguarding for Adults level 1	92%
Safeguarding for Children and Young People level 1	91%

New for 2022/23

- Appointment of a new quality coach with a review of roles and responsibilities.
- Review of eligibility of colleagues for advanced safeguarding courses and implementation of new requirements matrix.
- Introduction of a new course in May 2023 “Identifying and supporting victims of modern slavery”, with 53% completion rate achieved within 1 month.
- Modern slavery training resources have been posted to The Hub intranet, including a video by the Gangmasters and Labour Abuse Authority (GLAA) and Stronger Together materials.



Gangmasters and
Labour Abuse Authority

**stronger
together**

Our Policies

Here's policies are held centrally so that all staff can easily access them. Our policies that are relevant to preventing modern slavery are:

Raising a Concern (Whistleblowing) policy: Here is committed to the highest possible standards of openness, probity and accountability. Colleagues are encouraged to come forward with any serious concerns about any aspect of Here's work and to voice those concerns on a confidential basis. Our policy is designed to make it easy for colleagues to make disclosures, without fear of retaliation. The policy identifies routes for raising a concern and recommended next steps.

Safeguarding Policies: these set out guidance for all colleagues in raising a safeguarding concern. It identifies staff responsibilities for safeguarding and routes for raising a concern.

Anti-Bribery and Corruption Policy: we recognise the intrinsic link between modern slavery and financial crime and this policy sets out our responsibilities for preventing, identifying and reporting bribery and corruption.

Anti-Bullying and Harassment Policy: as an equal opportunities employer we support a working environment which promotes treating everyone with dignity and respect.

Incident Reporting Policy: every service takes responsibility for its own incident reporting. Colleagues receive training on reporting incidents with the focus on improving effectiveness and continuous organisational learning. Our policy is clear that an integral part of a continuous programme for quality improvement involves reporting incidents whether they be adverse events, near misses or serious incidents requiring investigation. Incident reporting is shared across the service and the organisation and with any partners.

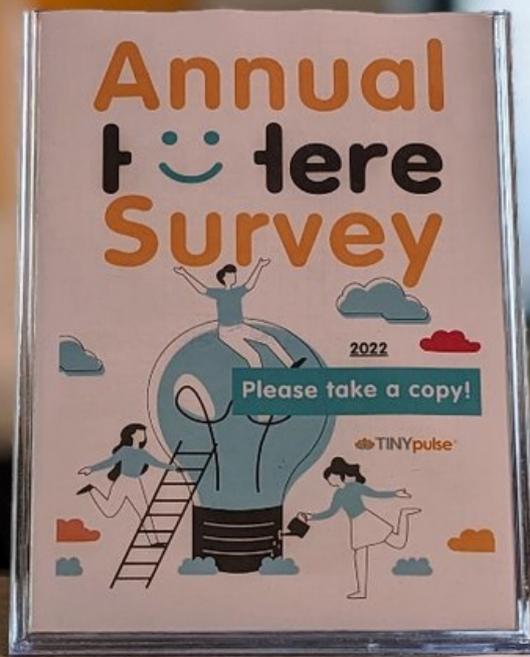
Pay and Progression Policy: this was recently rewritten to formalise the principles of fairness and consistency in pay across our organisation. A number of measures were committed to in the policy to ensure that our pay was fair including annual comparisons across the organisation of pay by band, team and role. Our commitment to paying the Real Living Wage was formalised in the new Pay and Progression policy.

KPIs for 2022/23

Policy	% attested 2022/23
Raising a concern (whistleblowing)	89%
Safeguarding	82%
Anti Bribery and Corruption	87%
Anti-Bullying and Harassment	88%
Pay and Progression	86%

New for 2022/23

- We have reviewed and rewritten all our HR policies with the help of an external HR advisor, consulting with our service leads over what was needed and practical ensuring compliance with legislation and best practice.
- We implemented a new platform to hold our policies which automatically prompts policy owners to review and update them periodically and prompts employees to attest that have read and understood the policies. These attestations are monitored to ensure policy awareness.



Our Staff Survey

Here's annual staff survey provides us with unbiased insight as to whether our colleagues feel that our policies in these areas are working. Our survey response rate in 2023 was 73% so we feel this is a strong representation of opinion.

As you can see, we have achieved even higher scores in 2023 than in 2022 which surpass the industry benchmarks provided by the NHS survey for the same questions.

KPIs from the 2023 survey:

Question	Here answers	NHS survey answers
I feel safe to speak up about anything that concerns me at Here	88% (prior year 84%)	61.5% (prior year 62.1%)
I would feel confident that my organisation would address my concern	80% (prior year 71%)	56.7% (prior year 59.5%)
Here treats colleagues fairly who are involved in an error, near miss or incident, without blame.	89% (prior year 82%)	58.1% (prior year n/a)

Our Supply Chain

We believe there is a very low likelihood of there being any modern slavery or human trafficking either within Here or within the supply chains as we have limited exposure to high-risk sectors or geographical areas.

Geographical areas

Here relies almost entirely on UK suppliers, with only our IT and insurance procurement using overseas companies from well-reputed brands and up to date Modern Slavery Statements. Where we can do so economically, we use local suppliers to support our local economy and to enable us to meet with suppliers.

Industry sectors

Our main suppliers are NHS trusts who have robust anti-modern slavery processes and as public bodies, all voluntarily issue annual Modern Slavery Statements.

Governance

Our procurement process is formalised in our Standing Financial Instructions, which is a governance code by which all our financial activities occur within the organisation. This ensures integrity and transparency in our procurement processes.

Risk management approach

Our current risk assessment does not make us complacent: as we are now a large organisation, the risks of modern slavery occurring within our supply chain increases. We are commencing a risk assessment led review of our supply chain in 2023/24 with the view to implementing an appropriate process around onboarding new suppliers, This review will be conducted in conjunction with a review of our suppliers for their sustainability credentials.

KPIs for FY22/23: Analysis of suppliers

Supplier category	% paid in 2022/23
NHS Trusts	66.1%
Independent healthcare providers	25.5%
GP practices/Primary Care Networks/Federations	1.9%
Government bodies	1.0%
Other	5.6%
Total	100%

99.7%

of supplier payments are to UK registered companies

70.3%

of supplier payments paid to Sussex based companies

66.4%

of supplier payments paid to Brighton and Hove based companies



Our Recruitment Process

Here uses a number of strategies to protect our staff and organisation from modern slavery:

- Here undertakes pre-employment checks for all people being recruited, including that they have the required legal documents to verify their right to work and their identity.
- We undertake the appropriate Disclosure and Barring Service (DBS) checks with all new staff.
- We keep the use of employment agencies to a minimum, but when we do need to use them, we have reputable preferred suppliers providing assurance of due diligence.

New for FY22/23

- IR 35 legislation has meant that instead of using temporary staff, we have needed to onboard casual staff with standard contracts to support our services that require sessional staff. This has meant that greater onboarding standards were implemented and carried out in-house by our HR teams rather than previous relying on external recruitment agency processes.
- We recently took external HR advice on our employment contracts and updated them to ensure that we continue to be compliant with relevant UK employment law and best practice to protect the rights of the employee.



Independent Verification

To provide independent external support to our anti-modern slavery processes, we also have the reassurance provided by four externally provided processes. Reports from all three external bodies are reported up to Board level.

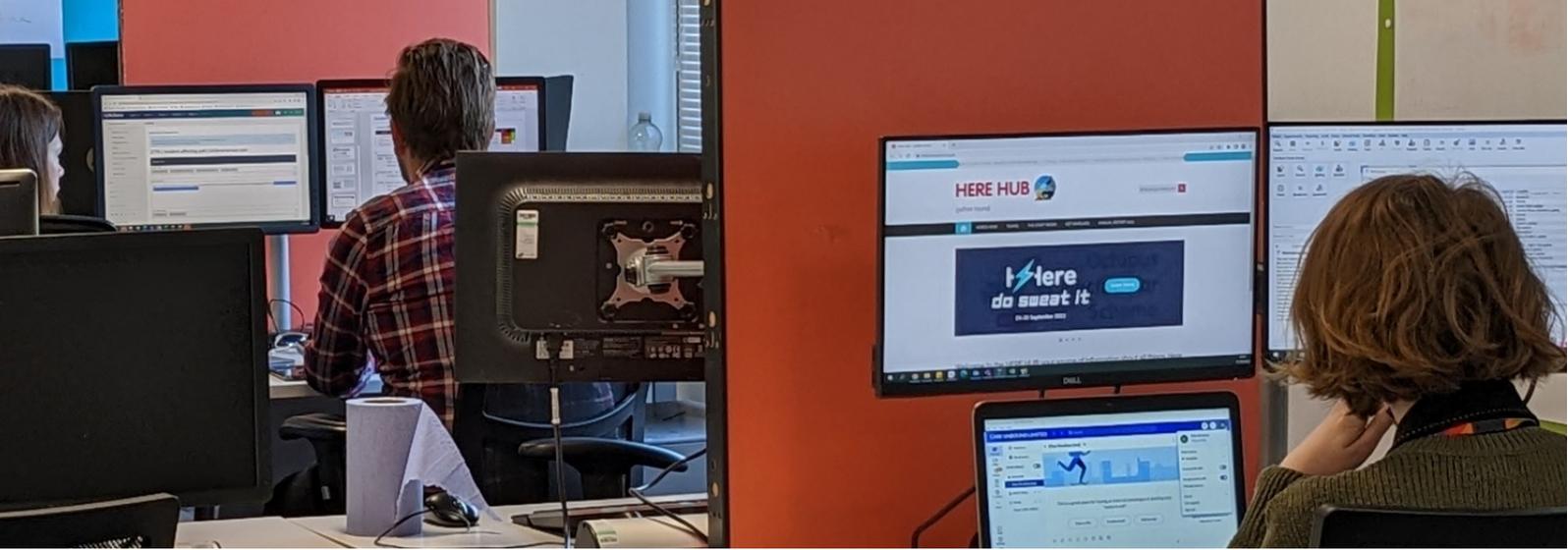
Here is regulated by the Care Quality Commission (CQC) and during inspections, CQC will check that “that providers have systems and processes in place to identify abuse and safeguard people from harm. This extends to ensuring that victims of modern slavery or human trafficking are protected and that any crimes of enslavement or trafficking are reported”.

As we manage public funds, we contract a business advisory service, TIAA, who are anti-crime specialists in the public sector, to carry out a programme of work throughout the year covering our policies and practices to ensure that we are doing what we say we are doing. We follow the Government Functional Standard (Govs 013: Counter Fraud). The Government Functional Standard (component 3) requires that organisations have carried out comprehensive risk assessments of fraud, bribery and corruption risks and have counter fraud, bribery and corruption provision that is proportionate to the level of risk identified. Risks are recorded and managed in line with Here Risk Management Strategy and are included on the appropriate risk registers. Measures to mitigate identified risks are included in an organisational work-plan, progress is monitored at a senior level within Here, and results are fed back to the appropriate management meetings and committees.

Our financial accounts are required to be externally audited each year by accountants whose professional ethics require them to report any modern slavery suspicions present at their clients.

KPIs for FY22/23

	<p>Monitored by the CQC in May 2022. Last inspection was June 2019 when we were rated outstanding.</p>
	<p>TIAA annual report, July 2022 for FY21/22 summary:</p> <ul style="list-style-type: none"> ◦ There were no frauds subject to investigation that met the materiality threshold for referral to Here's external auditors. ◦ No significant system failures or control weaknesses were identified that impact on Here's Annual Governance Statement. ◦ The Counter Fraud function is embedded well within Here, and the work undertaken successfully addresses the generic areas of Here's Counter Fraud strategy. ◦ In accordance with the Government Functional Standard 013 Counter Fraud, Here was required to complete a Counter Fraud Functional Standard Return (CFFSR) and this has been assessed with an overall rating of GREEN for 2021/22.
	<p>Unqualified audit report on FY21/22 financial statements</p>



Priorities for 2023/24

- Refresh our risk assessment to modern slavery to understand the risk areas within our business and inform future actions.
- Review and update our existing approach to supplier due diligence, including:
 - Undertake a risk analysis on our supplier spend
 - Check whether suppliers are eligible to publish a Modern Slavery Statement and what actions they take to minimise the risk of modern slavery within their organisation.
 - Consider whether to create a supplier code of conduct for our suppliers.
- Continue to encourage completion of the new modern slavery training course for patient-facing colleagues to achieve our baseline target of 85%.
- Deliver an awareness training course for non-clinical staff.

**If you would like more information about Here
and the work we do, please get in touch.**

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here

**Modern Slavery
Statement**

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