



Modern Slavery Statement

2024



Modern Slavery Act 2015

2015 CHAPTER 30

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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 2024, 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 10th July 2024.

Signed:



Lesley Jay, FCA
Finance Director



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About Here

Care Unbound Ltd t/a 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 196 people including 27 on casual contracts. The majority of our services operate throughout the year.

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, 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 2023/24

- An increasingly cost sensitive commissioning environment increases complexity and needs to save costs for services and our suppliers.
- Cost of living pressures has increased the possibility of financial crime and exploitation.

Approach for 2024/25

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.
- Identifying and Supporting Victims of Modern Slavery training: all clinicians and patient facing staff 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.

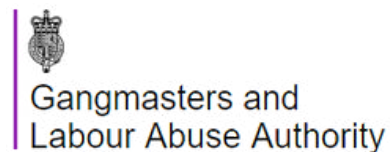
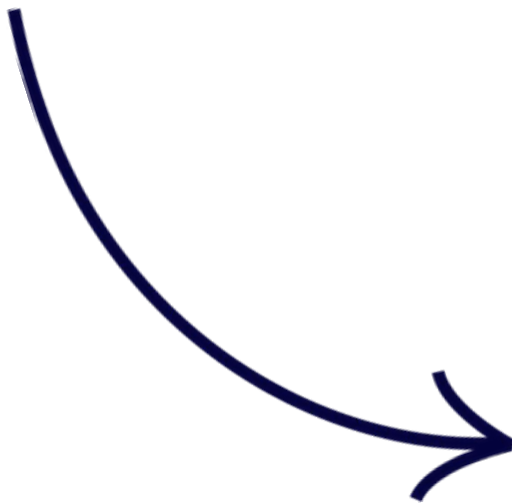
The Finance Director continues to remain updated on best practice and legislative changes to the Modern Slavery Act via training and updates through her membership of the ICAEW.

KPIs for FY23/24

Training module	% completed 2022/23	% completed 2023/24
Safeguarding for Adults level 1	92%	98%
Safeguarding for Children and Young People level 1	91%	97%
Identifying and Supporting Victims of Modern Slavery	54%	99%

New for 2023/24

- We have brought our HR and People and Culture functions together into a new People Team responsible for all parts of the work cycle from recruiting and onboarding, learning and development and People Ops.
- Review of eligibility of colleagues for advanced safeguarding courses and implementation of new requirements matrix.
- Identifying and supporting victims of modern slavery training, with a current 95% completion rate.
- 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.
- We have created an interactive internal training session for all staff on Identifying and Supporting Victims of Modern Slavery. A recording of this training is available for all colleagues.



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 2023/24

Policy	% attested 2022/23	% attested 2023/24
Raising a concern (whistleblowing)	89%	96%
Safeguarding	82%	95%
Anti Bribery and Corruption	87%	96%
Anti-Bullying and Harassment	88%	97%
Pay and Progression	86%	95%

New for 2023/24



- We progressed to all policies the implementation of our 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.
- The policy completion rates are shared with senior leadership on a monthly basis to monitor attestation rates.

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 2024 was 81% which is an increase of 8% from the 2023 results. We feel this is a strong representation of opinion

KPIs from the 2024 survey:

Question	Here answers	NHS survey answers
I feel safe to speak up about anything that concerns me at Here	82% (prior year 88%)	62%
I would feel confident that my organisation would address my concern	87% (prior year 71%)	57%
Here treats colleagues fairly who are involved in an error, near miss or incident, without blame.	84% (prior year 80%)	45%

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 a large organisation, the risks of modern slavery occurring within our supply chain has increased. We have led a review of our whole supply chain in 2023/24 with a new process of onboarding new suppliers being put in place with the creation of a 'New Supplier Form'.

Please see our latest Prompt Payment Code on our website for further analysis of our suppliers.

KPIs for FY23/24: Analysis of suppliers

Supplier category	% paid in 2022/23	% paid in 2023/24
NHS Trusts	66.1%	66.5%
Independent healthcare providers	25.5%	28%
GP practices/Primary Care Networks/Federations	1.9%	0.2%
Government bodies	1.0%	0.8%
Other	5.6%	4.5%
Total	100%	100%

99.8%

of supplier payments are to UK registered companies

86.8%

of supplier payments paid to Sussex based companies

65.7%

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 FY23/24



We have a new integrated and centralised recruitment platform enabling us to work to higher standards of equity, diversity and inclusion.

We have full transparency of salaries offered and can now capture and monitor recruiting trends such as by protected characteristics and how they find us.

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 FY23/24

	<p>Monitored by the CQC in May 2022. Last inspection was June 2019 when we were rated outstanding.</p>
	<p>TIAA annual report, July 2023 for FY22/23 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 2022/23.
	<p>Unqualified audit report on FY22/23 financial statements</p>

Priorities for 2024/25

- Following the supplier review which was a priority last year, we have implemented a new form to be completed by new suppliers, this includes screening for their payment policies, do they support the Real Living Wage, confirmation of a modern slavery statement/ policies in place, and environmental practices.
- Continue to encourage completion of the new modern slavery training course for patient-facing colleagues to maintain our baseline target of 85%.
- Continue to deliver a regular awareness training course for non-clinical staff by webinars and sharing the recording of the Here is Learning Modern Slavery session and include this within the onboarding process of new staff.
- Our due diligence process on new partners has been formalised and now includes the same value reviews as supplier vetting including whether they have a Modern Slavery Statement.

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

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