

# Modern slavery and human trafficking statement

## Introduction

City and County Healthcare Group (“the group”) and each of its subsidiary companies has made explicit in its Modern Slavery Policy its commitment to ensuring over time that its business and supply chains are free of the exploitative practices of slave labour and human trafficking.

This statement provides contextual information on the group and its operations and supply chains and explains what has been done in each financial year since 2018 to ensure that the group does not support modern slavery or human trafficking in any way. The statement also explains our plans for the next financial year in furthering this agenda.

This updated statement was published in November 2021 to give effect to s.54(9) of the Modern Slavery Act 2015.

## Context

City and County Healthcare Group comprises a number of companies which provide community-based health and social care support services across the UK, mostly under contract to the public sector. Personal care for older and disabled people living in their own homes makes up the large part of the services provided, but companies in the group also provide some more complex, specialised support, including health care.

The group operates to all intents and purposes as a single organisation with one management structure and a single policy framework, governance arrangements and supply chain (see below).

The group’s staff are directly employed and enjoy full employment rights under UK law. Most front-line employees delivering care are employed on a flexible basis without guaranteed hours of work, but work is typically consistent throughout the year and is not seasonal.

## Supply chain

As a provider of personal services in the community, the group’s procurement needs are relatively simple, covering mostly:

- Rental, furnishing, equipping and maintenance of local offices (including utilities);
- Implementation and maintenance of IT and communication systems;
- Equipment, uniforms and supplies for care workers;
- Marketing and communications;
- Recruitment and HR;
- Accommodation, travel and other routine business needs;

- Legal, accountancy and consultancy.

The group does not currently use any non-UK suppliers directly.

## What we did in 2018-19

In the financial year 2018-19, as part of its overall development of supply chain transparency, the group introduced routine checks on the arrangements its suppliers have in place for eliminating any modern slavery and human trafficking from its supply chains. It achieved this by:

- Reviewing and updating its probity and sustainability policies, both of which include specific references to modern slavery;
- Reviewing and updating its safeguarding and whistleblowing policies, both of which include references to modern slavery;
- Including modern slavery and human trafficking awareness in care worker training, to equip them to identify signs of such practices in the communities in which they deliver care;
- Requesting that all its suppliers complete a supplier questionnaire detailing the arrangements they have in place in respect of eliminating modern slavery and human trafficking from their supply chains.

## What we did in 2019-20

In the financial year 2019-20, the group continued to implement the measures put in place in the previous financial year, with a view to a further review of supply chain arrangements in the following financial year (2020-21).

There were no further material changes to policy or systems.

## What we did in 2020-21

The 2020-21 financial year began just after the start of the ongoing COVID-19 coronavirus pandemic and as a provider of front-line social care, the group's operational priorities altered dramatically overnight, effectively putting it on a "war footing" overnight and diverting resources into crisis management.

Consequently, no material advances were made in the group's sustainability agenda during the financial year.

## What we are doing in 2021-22 and beyond

In the financial year 2021-22, the group will begin work on an update to its supplier policy to including a supplier code, giving effect to its probity, sustainability and modern slavery policies, with the aim of implementation during the following financial year (2022-23).

The aim is that implementation of the updated policy will, during 2022-23:

- Ensure that all existing suppliers have completed an ethical supply chains survey, including reference to modern slavery and human trafficking;
- Bring to an end relationships with suppliers that are unwilling or unable to comply with the supplier code or that are found to be involved in modern slavery or human trafficking (or other unethical business conduct);
- Provide training for those with procurement responsibilities covering modern slavery in general and the systems and practices described above.

## Enquiries

Any enquiries about this statement should be directed to [enquiries@candhealthcare.co.uk](mailto:enquiries@candhealthcare.co.uk)