



healthshare

Modern Slavery  
Statement  
September 2024

## **Modern Slavery Statement 2024**

### **Accessibility**

If you need this policy in a different language, another format or any help reading this document, then please get in touch with the Human Resources Team.

### **Introduction**

This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out Healthshare's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024.

As part of the healthcare sector, Healthshare recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Healthshare is absolutely committed to preventing slavery and human trafficking in its corporate activities, and ensuring that those in its supply chains, and contractors, are free from slavery and human trafficking and comply with our values.

### **Organisational structure and supply chains**

This policy covers the activities of Healthshare Limited and Healthshare Diagnostics Limited.

Healthshare is a provider of clinical and diagnostics services nationwide to the NHS, insurers, employers and private patients. Healthshare's head office is in Kings Hill, Kent but operates from numerous sites across England.

Healthshare's supply chain mainly comprises of clinicians instructed to provide clinical services. Our supply chain also comprises suppliers as expected in the running of offices, healthcare and diagnostic clinics; including facilities services, PPE providers, recruitment agencies, training and diagnostic equipment providers.

Healthshare currently only operates in the United Kingdom and has an annual turnover in excess of £39m

### **Risk Assessment Process**

On a quarterly basis, Healthshare's Group Board evaluates the business risks, comprising country risks, sector risks, transaction risks and business partnerships, to determine whether or not particular activities or countries are high risk in relation to slavery or human trafficking. Any risks identified from the above process will be prioritised and dealt with in accordance with the due diligence section below.

### High-risk activities

Healthshare does not believe it has any particular activities or is involved with any countries which are high risk in relation to slavery or human trafficking.

### Responsibility

Responsibility for Healthshare's anti-slavery initiatives is as follows:

- **Overall:** Healthshare Senior Leadership Team
- **Policies:** Human Resources Team
- **Risk assessment:** Due diligence and training: Group Governance Director

### Relevant policies

Healthshare operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Code of Conduct:** Healthshare has a Code of Conduct (included in our Staff Handbook) to ensure that suppliers are aware of our expectations and fundamental principles, and that these should extend into their own businesses and supply chain.
- **Whistleblowing policy:** Healthshare encourages all its staff, patients and other business partners to report any concerns related to the direct activities, or the supply chains of Healthshare. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Healthshare's whistleblowing procedure is designed to make it easy for staff to make disclosures, without fear of retaliation and therefore includes an anonymous online reporting service via the Intranet which escalates directly to the Freedom to Speak Up Guardian. Employees, patients or others who have concerns can complete our confidential disclosure form or make a report to our Freedom to Speak Up Ambassadors within each service.
- **Behaviour at work policy:** Healthshare's policy makes clear to employees the actions and behaviour expected of them when representing Healthshare. Healthshare strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Environmental Management System:** It is part of Healthshare's on-going commitment to reduce the impact the company has on the environment by checking and monitoring suppliers and contractors' standards through a third-party questionnaire. This process of checking supplier standards can be expanded to include Human Trafficking and slavery checks to increase knowledge and confidence when dealing with suppliers and contractors.

- **Quality Management System:** The Quality Policy sets out Healthshare's commitment to high quality practices, including a collaborative partnership approach to working with our key suppliers. Our commitment to this approach allows us to have confidence in our suppliers' commitment to preventing slavery and human trafficking in their operations, and those of their suppliers. Additionally, our registration to the Quality Management Standard ISO9001 ensures external assurance of this approach.

### **Due diligence**

Healthshare has committed to undertaking due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Healthshare's due diligence and reviews will include:

- Broadly considering suppliers to assess particular product or geographical risks of modern slavery and human trafficking;
- When engaging a new frequent supplier as part of contract negotiations/tender processes, enquire if they are a business that is required to have a Modern Slavery and Human Trafficking Statement, and what policies they have in place;
- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Where we identify high risk areas, explore those suppliers in greater detail;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- Where a potential frequent supplier is unwilling to provide statements, or complete a questionnaire on the matter, we will consider if we commence that business relationship;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan, including the termination of the business relationship;
- Ensuring contractual controls are in place with suppliers in relation to complying with Modern Slavery legislation.

### **Performance indicators**

In order to assess the effectiveness of our approach to modern slavery, Healthshare will be reviewing on an annual basis the following areas:

- Staff awareness
- Reviewing existing supply chains; and
- Developing a new suppliers' evaluation process.

### **Training and Awareness**

In the period covered by this statement 100% of employees in our business completed online safeguarding training which covered protection of human rights including prevention of slavery.

The Healthshare Board and Senior Team have considered and approved this statement and will continue to support the requirement of the legislation.

A handwritten signature in black ink, appearing to read "Nick McGrath".

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**Nick McGrath**  
**Chief Executive Officer**