

## Modern Slavery Statement for 2019 Financial Year

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 (the 'Act') and sets out the steps we are taking to ensure that slavery and human trafficking is not taking place in our supply chain or elsewhere in our organisation.

### **Our organisation and structure**

Nuffield Health is a registered charity and company limited by guarantee providing connected health and wellbeing services to businesses and individuals in England, Scotland and Wales. We have an annual turnover in excess of £900 million and our head office is located in Epsom, Surrey.

### **Policies and commitments: our approach**

The wellbeing of people is central to Nuffield Health's activities. A day-to-day life and working environment in which individual fundamental human rights and freedoms are respected is central to this.

In accordance with our values and our overarching commitment to acting ethically and with integrity in all our relationships, the prevention, detection and reporting of modern slavery and human trafficking is the responsibility of all those working for Nuffield Health and any associated organisations.

We embrace a diverse and safe workplace environment in which equal opportunity and fairness are paramount. One important aspect of this is supporting and complying with the provisions of the Act and our organisational policies incorporate relevant compliance obligations. These obligations are reflected in our employee induction and training materials. We also support an open and transparent culture that encourages employees and others to raise concerns about anything that is unlawful or amounts to improper conduct. We also seek to ensure matters can be raised in confidence without fear of reprisals.

### **Our supply chain**

Our supply chain includes clinical supplies, marketing, IT, utilities, pharmaceuticals, support services, consulting and professional services.

We procure our goods and services from a rigorously selected group of predominantly domestic suppliers. We do not simply buy goods or services solely on the basis of cost. We recognise that some of our supply sectors are potentially higher risk and some services may involve relatively high levels of contracted labour (for example textiles relating to the clothing and uniform of certain staff).

We expect and take all reasonable and practical steps to require all suppliers in our supply chain to adhere to our values and policies. We assess and categorise suppliers taking into account the type and nature of their business in the context of the goods or services supplied as well as country of operation and industry characteristics. Suppliers categorised as presenting a significant risk of modern slavery or trafficking are subject to additional due diligence, primarily including checks of their own modern slavery and human trafficking statements where applicable, and any other published policies and procedures. If, following additional due diligence and checks, a supplier is still assessed as presenting a significant risk of modern slavery or failing to meet our standards, they are required to complete a modern slavery questionnaire in order to enable us to further assess the risks of the presence of modern slavery within the particular supplier's organisation.

### **Non-compliance**

If we find a supplier is non-compliant with our policies or contractual requirements relating to anti-slavery or provides inadequate information, we will, depending on the circumstances, either terminate the arrangement without delay, or work with the relevant supplier to improve their performance.

Based on our supply chain due diligence and review during the course of the 2019 financial year ended 31st December 2019, we are satisfied that our key suppliers have appropriate anti-slavery policies in place.

### **Embedding the Principles of the Act**

Over the past two years, we have taken the following steps to ensure compliance with the Act:

- Introduced mandatory modern slavery training for employees and made them aware of appropriate action to take if they suspect an instance of slavery or human trafficking
- Ensured that modern slavery risks and compliance are key considerations for Nuffield as an employer and procurer of goods and services
- Updated our contractual terms and conditions to reference the Act and to include a specific requirement for suppliers to comply with the Act
- Delivered targeted training sessions to staff procuring goods and services
- Reviewed and evaluated the risks of modern slavery in our supply chain.

In terms of ongoing compliance, this year Nuffield Health will undertake the following activities:

- Continue to develop awareness of the Act amongst its people and ensure awareness of reporting mechanisms if an instance of modern slavery or human trafficking is suspected
- Develop measures including a specific anti-slavery policy to evidence our commitment to the principles of the Act
- Continue to review and strengthen our procurement processes and policy, taking into account a range of risks, including slavery and human trafficking.