

Modern Slavery and Human Trafficking Statement / Policy

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Responsible officer	Alan Weinstock – CEO
Accountable Executive Lead	CEO
Approving Body	Board of Trustees
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Version History

Date	Version	Changes
February 2025	1.0	First version published
June 2026	2.0	Updated to reflect current procurement requirements, supply chain due diligence and governance arrangements

1. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Health Exchange incorporating Living Well Taking Control (HEX-LWTC) has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to help ensure modern slavery is not taking place anywhere within our own organisation or in any of our supply chains.

We are committed to ensuring transparency in our business activities and in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015.

This policy applies to all employees, directors, trustees, volunteers, associates, consultants, contractors, subcontractors, delivery partners and any other individuals working on behalf of HEX-LWTC. It does not form part of any employee's contract of employment and may be amended from time to time to reflect changes in legislation, organisational requirements or best practice.

This document also fulfils HEX-LWTC's commitment to publish an annual statement outlining the steps taken to prevent modern slavery and human trafficking within its operations and supply chains.

2. Our Organisation and Supply Chains

HEx-LWTC delivers a range of health improvement, prevention, wellbeing, employment and community-based services on behalf of public sector organisations, including NHS bodies, local authorities and other commissioners.

Our workforce comprises employees, associates, volunteers and delivery partners operating predominantly within the United Kingdom.

Our supply chains are generally low risk and primarily consist of:

- Professional and consultancy services
- Digital and technology suppliers
- Training and learning providers
- Community venues and facilities
- Delivery partners and subcontractors
- Office and operational support services

Whilst we consider the overall risk of modern slavery within our operations to be low, we recognise our responsibility to remain vigilant and to ensure appropriate safeguards are in place.

3. Our Commitment

Our response to the Modern Slavery Act is supported through our wider safeguarding arrangements, policies, procedures and staff training, which identify modern slavery and human trafficking as potential forms of abuse and exploitation.

We expect the same high standards from all contractors, suppliers, delivery partners and subcontractors. We seek to ensure that all organisations acting on our behalf operate in a manner consistent with our values and legal obligations.

As part of our contracting and procurement processes, we include appropriate expectations relating to ethical business practices and compliance with relevant legislation, including the Modern Slavery Act 2015.

4. Policies and Controls

Our approach to preventing modern slavery is supported by a range of organisational policies and procedures, including:

- Safeguarding Policy
- Whistleblowing Policy
- Recruitment and Selection Procedures
- Equality, Diversity and Inclusion Policies
- Disciplinary and Grievance Procedures
- Procurement and Contract Management Processes
- Data Protection and Information Governance Policies

Together, these provide a framework for identifying, reporting and addressing concerns relating to modern slavery, exploitation and unethical employment practices.

5. Due Diligence and Supplier Assurance

To support this commitment, we undertake proportionate due diligence when selecting suppliers, subcontractors and delivery partners. This may include:

- Assessing supplier suitability during procurement processes
- Reviewing organisational policies and governance arrangements where appropriate
- Including contractual requirements relating to legal and ethical compliance
- Seeking assurance that suppliers and partners operate in accordance with applicable employment legislation
- Monitoring supplier performance and contract compliance where appropriate

Where concerns are identified, we will work with suppliers and partners to understand and address issues and may take further action where necessary.

We expect our suppliers, subcontractors, delivery partners and other business associates to uphold the same high standards that we apply within our own organisation. Where appropriate, we seek assurance that suppliers operate in accordance with applicable employment legislation and maintain suitable policies and controls relating to modern slavery and human trafficking. We expect suppliers to promote the same standards throughout their own supply chains.

It should be noted that, where appropriate and with the welfare and safety of workers as a priority, we will seek to support suppliers and partners in addressing any identified concerns relating to coercive, abusive or exploitative working practices.

6. Risk Assessment and Management:

We consider the risk of modern slavery occurring within our directly employed workforce to be low. Potential risks are more likely to arise through wider supply chains, subcontracting arrangements or third-party service provision.

To mitigate these risks, we:

- Maintain safeguarding arrangements that recognise modern slavery as a form of abuse
- Promote awareness amongst staff and managers
- Operate recruitment processes designed to prevent exploitation
- Encourage the reporting of concerns
- Apply appropriate supplier and partner assurance measures

Risk assessments and controls will be reviewed periodically as part of our governance arrangements.

7. Training and Awareness

Modern slavery awareness forms part of our wider safeguarding approach. Staff are expected to complete safeguarding training appropriate to their role and are encouraged to understand the signs and indicators of modern slavery, exploitation and human trafficking.

8. Reporting Concerns

We will prioritise the procurement of environmentally responsible products and services and, where appropriate, consider opportunities to reduce carbon emissions associated with suppliers, venues, products and operational deliver

The prevention, detection and reporting of modern slavery is the responsibility of everyone working for or on behalf of HEx-LWTC. All individuals are required to avoid any activity that might lead to, or suggest, a breach of this policy. All employees, volunteers, contractors and partners are expected to raise concerns where they suspect modern slavery, human trafficking or exploitation may be taking place.

Concerns should be reported to a line manager, senior manager or director as soon as possible. They may also be raised through the organisation's Whistleblowing Policy. Concerns may relate to any part of our organisation or supply chains, including suppliers, subcontractors, delivery partners and any tier of their supply chains. We encourage concerns to be raised at the earliest possible stage.

If you are unsure whether a particular act, the treatment of workers more generally, or working conditions within any part of our organisation or supply chains could constitute modern slavery, human trafficking or exploitation, you should seek advice from your line manager, a senior manager or a director.

We aim to foster an open and supportive culture and will support anyone who raises genuine concerns in good faith under this policy, even if those concerns ultimately prove to be unfounded. We are committed to ensuring that no individual suffers detrimental treatment as a result of raising a concern in good faith regarding suspected modern slavery, human trafficking or exploitation.

Detrimental treatment may include dismissal, disciplinary action, threats, victimisation or any other unfavourable treatment connected with raising a concern. Any individual who believes they have suffered such treatment should report this to their line manager or a senior manager immediately. Employees may also raise concerns through the organisation's Grievance Procedure.

9. Measuring Effectiveness

We will monitor the effectiveness of our approach to tackling modern slavery through:

- Annual review of this policy
- Safeguarding training completion rates
- Monitoring and investigation of concerns raised
- Review of supplier and partner assurance arrangements where appropriate
- Periodic review of organisational policies and procedures

Any significant concerns or incidents will be escalated through appropriate governance channels.

10. Governance and Review

The Board of Trustees has overall responsibility for ensuring that HEx-LWTC meets its legal and ethical obligations relating to modern slavery.

The Chief Executive Officer has day-to-day responsibility for implementing this policy, monitoring compliance and ensuring appropriate action is taken where concerns arise.

Management at all levels are responsible for ensuring that those reporting to them understand this policy, receive appropriate training and know how to raise concerns relating to modern slavery, human trafficking and exploitation.

This policy will be reviewed annually or sooner where there are significant changes to legislation, organisational structure or contractual requirements.

11. Approval

This Modern Slavery and Human Trafficking Statement and Policy has been approved by the Board of Trustees of Health Exchange incorporating Living Well Taking Control.