

Modern Slavery and Human Trafficking Act Statement

1. Introduction

At Integrated Care 24 (IC24) we are committed to ensuring that no modern slavery or human trafficking takes place in any part of our business or our Supply chain. This statement sets out actions taken by IC24 to understand all potential modern slavery and human trafficking risks and to implement effective systems and controls.

Section 54 of the Modern Slavery Act 2015 requires us to set out the steps that we have taken to ensure that slavery and human trafficking is not taking place in our supply chain, and in any part of our business.

2. Organisational Structure

IC24 provides a comprehensive range of urgent primary care services for approximately six million people across the following locations:

- Kent (excluding Medway)
- Brighton & Hove
- East Sussex
- West Sussex
- Mid and South Essex
- Norfolk & Waveney

Our annual turnover to the year ended 30th June 2023 was £73 million. We delivered three 111 services from our three care co-ordination centres and OOH care was provided from circa 50 bases across the localities. In addition, IC24 provided:

- A Nurse Led Walk in centre in Hastings
- District Nurse overnight service
- One 100 hour pharmacy
- GP front ending services in Brighton
- Home visiting services in Norfolk, Essex, Sussex and Kent and
- Primary Care GP services in 3 practices in Sussex

Our workforce comprises of circa. 1200 people including both clinical and non-clinical colleagues.

3. Our Policy on Slavery and Human Trafficking

IC24 have internal policies and procedures in place that assess supplier risk in relation to the potential for modern slavery or human trafficking. We review our suppliers to identify those which represent highest risk by considering, size, nature of service and type of products supplied. We then aim to achieve assurance from at least 80% of these high-risk suppliers by asking them to affirm their compliance with the modern slavery and human trafficking act within their own organisation, sub-contracting arrangements and supply chain.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the Finance Department taking responsibility for overall compliance.

4. Due Diligence

To identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain we:

- Purchase a significant number of products through NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour
- Where possible, build long standing relationships with suppliers
- IC24 request suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through agreement of our 'Supplier Code of Conduct', purchase orders and tender specifications. All of which sets out our commitment to ensuring no modern slavery or human trafficking related to our business
- IC24 will write bi-annually to our top suppliers asking them to affirm their compliance with the legislation. The resultant Supplier Policies are logged, scanned and recorded
- IC24 will ask for evidence of Policy existing as part of all formal tender processes
- IC24 will review compliance with our policy requirements as part of the production of our Annual Report and Accounts.

5. Training

Modern Slavery is one of our essential learning modules that all colleagues are required to complete in IC24. This was launched in July 2018 as part of the implementation of our new Learning Management system.

IC24 considers the principal risks related to slavery and human trafficking and identifies them as:

- Reputational
- Lack of assurances from suppliers
- Lack of anti-slavery clauses in contracts
- Training staff to maintain our position around anti-slavery and human trafficking.

6. Aim

The aim of this statement is to demonstrate that IC24 follows good practice and all reasonable steps are taken to prevent slavery and human trafficking.

7. Board of Directors' Approval

The Board of Directors has considered and approved this statement on 29th May 2024 and will continue to support the requirements of the legislation.

A handwritten signature in blue ink, appearing to read 'S King'.

Stephen King
Chair

A handwritten signature in blue ink, appearing to read 'A Catto'.

Andrew Catto
Chief Executive

29th May 2024

