

# Operose Health Modern Slavery Statement

## **Introduction**

This statement sets out the modern slavery strategy adopted by the Operose Health Family of Companies (hereafter referred to as 'Operose Health').

Operose Health is committed to upholding the principles of the prevention and identification of modern slavery and does not tolerate such activities, aiming to eliminate and prevent all such activities as far as possible.

We are committed to acting ethically and with integrity in all our business dealings and relationships. This statement sets out the actions we take to get assurance that modern slavery or human trafficking is not taking place anywhere in our own business, in our supply chains, or in any external organisations that we use, and to mitigate this risk as far as possible.

## **Organisational Structure**

A multi-company group working in the UK health sector, Operose Health are the largest provider of NHS primary care in England.

We deliver care to over 704,165 patients across the country through our GP practices, Primary Care Hubs, ED Streaming Services and Urgent Care Services.

Through our scale, determination and our passion for transforming the patient experience, we continue to define and revolutionise the future of primary care. Working closely with our patients and commissioners, we create services that truly meet the needs of our communities to improve access, outcomes and patient experience.

## **Supply Chains**

Operose Health buys a range of services and supplies, which are procured in line with our Procurement Policy. We work with a range of multi-disciplinary stakeholders in the health and wider community sectors to deliver care to our patients.

## **Relevant Policies & Procedures**

### **Safeguarding Children, Young People & Unborn Baby**

This policy describes our approach to upholding the principles of safeguarding children (including unborn babies) and young people's health and welfare. It outlines how we enable all colleagues to spot the signs of abuse, including trafficking and modern slavery, and how to act and report it as necessary.

### **Safeguarding Adults Policy**

This policy outlines how Operose Health works to safeguard and protect adults at risk so that they can live a life free from abuse and neglect. It aims to inform all staff of the principles of safeguarding the health and welfare of adults, enabling them to spot the signs of abuse and know how to report if necessary.

### **Speaking Up Policy**

This policy sets out Operose Health's commitment to ensuring there is a consistent and clear approach to allowing and supporting all Operose Health staff to raise concerns within the organisation. This ensures staff are kept informed and provided with support in doing so, without fear of reprisals, and details the organisation's Freedom to Speak Up Guardian.

### **Code of Conduct Policy**

This policy sets out Operose Health's expectations of all colleagues regarding how they act and represent the organisation both in and outside of the work environment. This policy aims to ensure that all staff fully understand the organisation's expectations of them in promoting and adhering to Operose Health's expected ethical ways of working.

All Operose Health staff are required to avoid any activity that might lead to, or suggest, a breach of this statement.

### **Recruitment Policy**

This policy sets out Operose Health's approach to the recruitment of new employees, including our screening process. All prospective employees are required to undergo a number of pre-employment checks, applicable to the role, in accordance with NHS Employment Check Standards, the Health & Social Care Act, and the Immigration, Asylum and Nationality Act.

### **Procurement Procedure**

This procedure outlines the organisation's procurement process and the responsibilities of all colleagues involved in procuring goods and services from external suppliers.

This includes the supplier qualification checks which must take place, including verifying suppliers' compliance with legal and social responsibilities, checking for published slavery and human trafficking statements, and for any indicators of modern slavery.

We seek to understand our suppliers' workforce, establishing that there is an ethical supply of people. This includes assurance over who provides the workers, what their employment status is, right to work in the UK, and if there is any indication of exploitation or slavery.

### **Due Diligence Process for Modern Slavery and Human Trafficking**

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains. This is consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers, and other business partners. As part of our Procurement Procedure, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

Anyone who reports such activity is protected in the UK by the Public Interest Disclosure Act (PIDA) 1998 and Employment Rights Act 1996 as prescribed in our Speaking Up Policy.

### **Training and Awareness**

All Operose Health employees will receive training around signs of modern slavery and how to flag potential issues.

Updates will be provided using established methods of communication.

All service locations will display information regarding modern slavery and how to access the modern slavery helpline on 0800 0121 700. This will allow anyone who thinks they may have come across an instance of modern slavery, or may be a victim themselves, to call for more information and guidance on what to do next.

If a specific case of modern slavery is identified here in the UK, it will be reported to the police immediately on the non-emergency line: 101. If potential victims are in immediate danger the standard 999 emergency number will be used.

### **Our Effectiveness in combating human trafficking and slavery**

Operose Health will regularly risk assess the nature and extent of our exposure to the risk of modern slavery. This forms part of our wider human rights due diligence processes, allowing us to take targeted action to find, remedy and prevent it occurring in the future.

We instill and encourage a proactive culture toward the prevention of modern slavery and human trafficking within all our teams and to ensure information on procedures are made available to all employees.

We will support anyone who raises concerns about issues or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier in good faith under this statement.

We continually review of the effectiveness of the steps we take to maintain the principles set out in this statement including our:

- Supplier due diligence processes.
- Recruitment processes.
- Training
- Staff awareness of the main principles of Modern Slavery Act 2015 and its relevance to their role. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year 2026.

*To be approved by - Samantha Kane, CEO*



**07/05/2026**