

## Modern Slavery and Human Trafficking Statement

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### Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps Cumbria Health has taken to prevent modern slavery and human trafficking in its business operations and supply chains.

Cumbria Health is committed to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking are not taking place anywhere within the organisation or its supply chains.

### Purpose and structure

Cumbria Health is a social enterprise delivering NHS-funded primary care and community health services across Cumbria. We manage 6 GP practices and work in partnership with NHS organisations, local authorities, voluntary sector partners, and other stakeholders to improve access to healthcare and reduce health inequalities, particularly in rural and underserved communities.

Our workforce consists of directly employed staff, including clinicians, operational teams, and corporate support functions. We also have several agency staff, locums, and sessional workers to support service delivery where required.

### Supply chains

Our supply chains are predominantly UK-based and include:

- Clinical supplies and medical equipment
- IT systems and digital services
- Estates, facilities management, and utilities
- Professional services (e.g. legal, HR, finance, consultancy)
- Training and education providers

Due to the nature of our work and procurement profile, Cumbria Health considers the overall risk of modern slavery within our direct operations to be low.

### Policies and processes

Cumbria Health has a zero-tolerance approach to modern slavery and human trafficking. This commitment is embedded within our wider organisational policies and frameworks, including:

- Safeguarding Policy
- Raising Concerns Policy

- Recruitment and Selection Policy
- Code of Conduct
- Equality, Diversity and Inclusion Policy

These policies reinforce our commitment to fair treatment, lawful employment practices, and the protection of vulnerable individuals. All staff are encouraged to report concerns, and we aim to create an open and supportive culture where unethical behaviour is challenged.

### **Due diligence processes**

Cumbria Health undertakes proportionate due diligence to identify and mitigate the risk of modern slavery within our operations and supply chains. This includes:

- Ensuring robust recruitment practices, including right-to-work checks and fair pay arrangements
- Using NHS and public-sector procurement frameworks where possible, which require suppliers to meet ethical and legal standards
- Requesting assurances from key suppliers that they comply with the Modern Slavery Act 2015
- Reviewing supplier contracts to include appropriate safeguarding, ethical, and compliance clauses

Where risks are identified, we work collaboratively with suppliers to address concerns and improve standards.

### **Risk assessment and management**

Given the nature of our services and supplier base, Cumbria Health has identified the following areas as presenting a potential (though low) risk of modern slavery:

- Agency staffing and temporary labour
- Estates, cleaning, and facilities services
- Supply chains involving outsourced services

To manage these risks, Cumbria Health:

- Works with reputable, regulated agencies and suppliers
- Carries out periodic reviews of supplier arrangements
- Encourages transparency and open dialogue with partners
- Ensures safeguarding processes are embedded across services

We remain vigilant to emerging risks and adapt our approach as the organisation grows or diversifies.

### **Effectiveness and performance indicators**

Cumbria Health monitors the effectiveness of its approach to preventing modern slavery through:

- Compliance with recruitment, safeguarding, and employment policies
- Monitoring and review of supplier relationships
- Use of raising concerns and incident reporting mechanisms such as Freedom to Speak Up
- Management and board-level oversight of risk and governance

To date, no incidents of modern slavery or human trafficking have been identified within Cumbria Health's operations or supply chains.

### **Training and capacity building**

Cumbria Health recognises the importance of staff awareness in preventing modern slavery. Relevant training and capacity-building measures include:

- Mandatory safeguarding training for staff, which includes awareness of exploitation and vulnerability
- Access to organisational policies and guidance via internal systems
- Management support to identify and respond to concerns appropriately

As the organisation continues to develop, Cumbria Health will review opportunities to strengthen training and awareness specific to modern slavery and human trafficking.