

## Modality Partnership Modern Slavery Statement 2024/2025

### Introduction

The Modern Slavery Act 2015 consolidates offences related to human trafficking and slavery. Section 54 of the Act mandates that businesses with an annual turnover exceeding £36 million publish a statement demonstrating transparency in their supply chains. As a provider of healthcare services, Modality Partnership is committed to compliance with this Act and to combatting modern slavery in all its forms.

### Our Business

Established in June 2009, Modality Partnership is a leading primary care provider operating across ten divisions in Birmingham, Walsall, Hull, Airedale, Wharfedale and Craven, East Surrey, Wokingham, Lewisham, Mid-Sussex, St Helens, and Nottingham. With over 50 practices nationwide, we are dedicated to delivering high-quality healthcare services.

### Commitment to Preventing Modern Slavery

We are committed to ensuring that modern slavery and human trafficking have no place in our business or supply chains. Our approach is rooted in ethical practices, integrity, and stringent policies that uphold staff welfare and fair recruitment processes.

This statement is publicly available on our partnership website and included in our staff handbook.

### Due Diligence and Risk Mitigation

To identify and mitigate risks, our National Board and CEO oversee the implementation of robust measures, including:

- **Employment Practices:** Comprehensive pre-employment checks, including identity verification, Disclosure and Barring Service (DBS) checks, qualification and reference verification, and right-to-work checks.
- **Financial Transparency:** Verification of employee bank details to ensure salaries are paid directly to named accounts.
- **Workplace Conduct:** Strict adherence to ethical standards outlined in employment contracts, the staff handbook, and NHS codes of conduct.
- **Whistleblowing and Support:** Policies and procedures for reporting grievances, harassment, and misconduct, supported by HR professionals, Wellbeing Champions, and Freedom to Speak Guardians.
- **Training and Awareness:** Mandatory staff training on modern slavery awareness, with additional management training to ensure fair employment practices and staff welfare.
- **Voluntary Workforce Compliance:** All volunteers undergo the same background checks as paid employees, including right-to-work, DBS, and reference checks. They receive full onboarding and their working hours are monitored to comply with employment regulations.

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### **Supplier and Procurement Standards**

We maintain a zero-tolerance approach to slavery and human trafficking. To uphold ethical sourcing and procurement, we ensure that:

- Our procurement team is trained on the implications of the Modern Slavery Act.
- Suppliers and contractors align with our values and responsible sourcing principles.
- Staff members at all levels are responsible for identifying, reporting, and preventing modern slavery within our operations and supply chain.
- Breaches by individuals or organisations working on our behalf are addressed appropriately, with potential actions ranging from remediation to contract termination.

### **Governance and Accountability**

The National Board of Directors has reviewed and approved this statement, reaffirming our commitment to combat modern slavery in our organisation and supply chain. We will continue to enhance our policies and practices to ensure compliance with the Modern Slavery Act 2015.

**This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2025.**

#### **Vincent Sai**

Group Chief Executive  
Modality Partnership  
March 2025