

Harrow Health CIC – Modern Slavery and Human Trafficking Statement

This statement sets out the steps that Harrow Health CIC has taken, and continues to take, to ensure that modern slavery and human trafficking are not taking place within our organisation or supply chains.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Harrow Health CIC has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings, and to implementing effective systems and controls to safeguard against modern slavery.

About Harrow Health CIC

Harrow Health CIC is a community interest company providing primary care and community-based health services to residents across Harrow. We work in partnership with NHS organisations, local authorities, GP practices and other providers to deliver high-quality, patient-centred care. Our workforce includes directly employed staff as well as agency and contracted workers.

Our Commitment to Human Rights

We operate in an ethical, socially and environmentally responsible manner and recognise our responsibility to respect human rights as outlined in the International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights.

We do not tolerate discrimination, harassment or bullying and expect all staff and suppliers to uphold equality, dignity and respect.

Policies

We maintain robust policies including Human Rights and Ethics Policies, Whistleblowing Policy, Safeguarding Policies, Recruitment Policy, Employee Code of Conduct

We are a Right to Work accredited employer and undertake rigorous pre-employment checks, including verification of identity and legal right to work in the UK.

Direct Communication

We encourage staff, the public and external partners to raise concerns confidentially regarding suspected modern slavery.

Supply Chain Risk Assessment and Mitigation

Our supply chains include staffing, consumables, facilities, IT, utilities and waste management.

Risk Assessment Table

Area	Risk Level	Risk Factors	Mitigation
NHS and public sector partners	Low	Regulated environments	NHS governance and statutory compliance
Recruitment agencies	Medium	Temporary workforce	Approved suppliers, right to work checks

Facilities and support services	Medium	Labour-intensive roles	Due diligence, contractual controls
Medical goods and consumables	Higher	International supply chains	Procurement frameworks, supplier assurance
IT and professional services	Low	Skilled workforce	Established suppliers

Mitigation Measures

We mitigate risks through supplier due diligence and screening, Contractual modern slavery clauses, Use of NHS-approved procurement frameworks, Ongoing supplier monitoring, Staff training and safeguarding awareness, Clear reporting and escalation pathways, Contracts may be terminated where non-compliance is identified.

Risk Management

We regularly review risks relating to Agency workforce, Outsourced services and Procurement. Staff are trained to recognise and report concerns through safeguarding pathways.

Performance Indicators

Effectiveness is measured through: Monitoring safeguarding and whistleblowing reports, Internal audits and supplier compliance checks.

Safeguards

We promote openness and protect individuals raising concerns in good faith. Anonymous reporting is accepted, though may limit investigation effectiveness.

Board Assurance

The Board of Directors receives regular assurance on:

- Policy compliance
- Safeguarding activity
- Workforce checks
- Supplier management
- Risk and audit outcomes

The Board is satisfied that appropriate measures are in place to mitigate modern slavery risks.

Ongoing Improvement

We will continue to review and strengthen our approach through audits, training and policy updates.

Approval

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement of Harrow Health for the financial year ending 31st March 2026.

Approved by the Board of Directors.

Dr Kanesh Rajani, Chairman; Dr Mehul Lakhani, Director; Adam Mackintosh, CEO.