

Modern Slavery and Human Trafficking Statement

2025/2026

Modern Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Spectrum Community Health CiC (thereafter referred to as Spectrum) has taken during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking within our organisation and supply chains.

Modern slavery encompasses slavery, servitude, forced and compulsory labour, and human trafficking. Spectrum has a zero-tolerance approach to all forms of modern slavery and is committed to conducting business ethically, transparently and with integrity.

We are committed to implementing and maintaining effective systems and controls designed to reduce the risk of modern slavery within our organisation, services and supply chains.

This statement outlines our approach to identifying, preventing and mitigating the risks of modern slavery within our workplaces, procurement activities and wider operations.

Organisational Structure

Spectrum is a social enterprise delivering healthcare services to patients in Health & Justice and community settings. Our services include healthcare within health and justice and secure estates, substance misuse services, primary care, and integrated sexual health services.

Our Commitment to Preventing Modern Slavery

Spectrum recognises its responsibilities to patients, service users/clients, employees, contractors and the wider community. We expect all suppliers and contractors to uphold the same ethical standards and to comply with all relevant legislation relating to modern slavery and human trafficking.

We are committed to ensuring that there is no modern slavery or human trafficking within any part of our organisation or supply chains.

Policies and Internal Controls

We operate a range of internal policies and procedures to support ethical, transparent and lawful business practices and to safeguard against exploitation.

Recruitment and Employment Checks

We operate robust recruitment and pre-employment checking processes in line with NHS Employment Check Standards. This includes verification of identity, right to work in the UK, professional registration and employment history checks for all directly employed staff.

Agency workers are engaged through approved framework arrangements via our master vendor contract. These arrangements include audit and assurance processes to confirm that appropriate pre-employment checks have been completed and to reduce the risk of human trafficking or forced labour.

Equality, Diversity and Inclusion

Spectrum is committed to providing a fair and inclusive working environment. We have measures in place to protect employees from discrimination, poor treatment and exploitation, including:

- fair rates of pay.
- fair terms and conditions of employment; and
- access to training, development and wellbeing support.

Safeguarding

Our safeguarding policies and procedures support staff to recognise and respond appropriately to concerns relating to abuse, exploitation, neglect or modern slavery involving colleagues, patients, service users or others connected to our services.

Employees are encouraged to raise safeguarding concerns where they believe individuals may be at risk.

Sexual Safety in the Workplace

Spectrum is committed to providing a safe working environment for all employees. We have signed up to NHS England's Sexual Safety in Healthcare Organisational Charter and have implemented a Sexual Safety in the Workplace Policy and associated training.

The policy outlines unacceptable behaviours, support mechanisms available to staff, and the responsibilities of employees and managers in maintaining a safe and respectful workplace.

Freedom to Speak Up

Spectrum has established Freedom to Speak Up arrangements which enable employees to raise concerns safely and confidentially without fear of detriment.

We have:

- a Freedom to Speak Up Policy.
- A Freedom to Speak Up Guardian.
- processes to support the reporting and escalation of concerns relating to unethical practices, safeguarding matters or workforce exploitation.

Standards of Business Conduct

Our Standards of Business Conduct set out the behaviours and standards expected of employees, contractors and suppliers, including expectations relating to ethical conduct, integrity and compliance with relevant laws and regulations.

Risk Assessment and Due Diligence

Spectrum recognises that some sectors and supply chains may present a higher risk of modern slavery, particularly where temporary labour, outsourced services or complex supply arrangements are involved.

To mitigate these risks, we apply proportionate due diligence processes, including:

- supplier onboarding and assurance checks.
- use of NHS standard contractual terms.
- risk-based procurement assessments.
- contract monitoring arrangements.
- escalation of safeguarding or workforce concerns where appropriate.

We continue to review and strengthen our approach to identifying and managing modern slavery risks across our organisation and supply chains.

Procurement and Supply Chain Management

Spectrum complies with its legal obligations when procuring services.

Procurement Act 2023 states that certain modern slavery offences under the Modern Slavery Act 2015 (slavery, servitude, forced labour, trafficking) are mandatory exclusion grounds for suppliers in regulated procurements. Spectrum may also discretionarily exclude suppliers or connected persons with evidence of modern slavery offences. For high-risk procurements, Spectrum shall apply modern slavery risk assessments, identify supply chain risks, implement due diligence, and integrate these into procurement design, award criteria, specifications, and contract clauses.

We shall also follow Procurement Policy Note 009 (“Tackling Modern Slavery in Government Supply Chains,”), including risk-based procurement approach, supply chain information disclosure at the selection stage for high-risk procurements, and enhanced due diligence and modern slavery KPIs.

In terms of the NHS Provider Selection Regime Regulations 2023, Spectrum shall collaborate with relevant authorities in conducting modern slavery risk assessments and to take reasonable and proportionate steps to respond to and mitigate identified risks.

Spectrum applies proportionate modern slavery risk assessments and due diligence measures to identify and mitigate potential risks within the supply chain. These measures may include:

- supplier assurance and compliance checks.
- review of supply chain transparency information.
- contractual requirements relating to ethical employment practices; and
- ongoing contract monitoring.

Where clinical services are commissioned or subcontracted, Spectrum uses the NHS Standard Contract and Sub-Contract arrangements, which require compliance with relevant legislation and governance standards.

Employees seeking to engage new suppliers are required to work with the Contracts Team to ensure that appropriate due diligence checks are completed.

Spectrum expects all direct and indirect suppliers and contractors to adopt a zero-tolerance approach to modern slavery and human trafficking.

Training and Awareness

Training and guidance relating to safeguarding, exploitation and modern slavery are available to staff through:

- mandatory safeguarding adults and children training.
- safeguarding policies and procedures.
- staff induction.
- specialist advice and support from the Safeguarding Team.

Additional training and awareness activities are provided where appropriate to support staff in recognising and responding to concerns relating to modern slavery and human trafficking.

We are committed to continuing to improve awareness and understanding of modern slavery risks across our organisation and supply chains.

Measuring Effectiveness

We assess the effectiveness of our approach through:

- completion rates for mandatory safeguarding training.
- monitoring concerns raised through Freedom to Speak Up processes.
- supplier compliance with contractual obligations.
- procurement due diligence activities.
- review of safeguarding, workforce or procurement concerns linked to exploitation or unethical labour practices.

During the reporting period, Spectrum received no reports of modern slavery or human trafficking, either within our organisation or supply chains.

Continuous Improvement

During 2026/27, Spectrum will continue to strengthen our approach to preventing modern slavery through:

- ongoing review of procurement and supplier assurance processes.
- continued staff training and awareness activity.
- monitoring emerging risks within supply chains.
- maintaining compliance with relevant legislation, best practice and/or NHS guidance.

Governance and Approval

Responsibility for this statement and oversight of modern slavery risks sits with the Board of Spectrum.

This statement was approved by the Executive Team on 26 May 2026 and the People Experience and Culture Committee on 10 June 2026.