

ANNUAL MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Financial Year: 2026/27

Approved by the Executive Leadership Team

1. Our Commitment

Eleventh Hour Group (EHG) is committed to preventing modern slavery, human trafficking, forced labour, servitude and all forms of exploitation throughout our organisation and supply chain.

As a provider of healthcare services to NHS organisations, Integrated Care Boards, Local Authorities and other public sector organisations, we recognise our responsibility to uphold the highest standards of integrity, transparency and ethical practice.

Modern slavery is fundamentally incompatible with our values and with the principles of dignity, equality and respect that underpin both the NHS Constitution and our own organisational culture. We maintain a zero-tolerance approach to modern slavery and expect the same commitment from every employee, worker, supplier and business partner

2. About Eleventh Hour Group

Eleventh Hour Group provides specialist healthcare services to NHS organisations and Local Authorities throughout the United Kingdom.

Our services include:

- Elective Recovery Services
- Insourcing Services
- Outpatient Services
- Community Healthcare Services
- Diagnostic Services
- Teledermatology
- Children's Services
- Adult Services

The Group works with a diverse workforce including employed staff, consultants, nurses, allied health professionals, healthcare assistants, agency workers and approved subcontractors.

Recognising the potential risks associated with large healthcare workforces and complex supply chains, EHG maintains robust governance arrangements to prevent exploitation and ensure ethical employment practices.

3. Our Policies

Our commitment is supported by a comprehensive Corporate Governance Framework including:

- Modern Slavery, Human Trafficking & Ethical Employment Policy

- Safeguarding Adults Policy
- Safeguarding Children Policy
- Recruitment & Selection Policy
- Workforce Compliance Policy
- Freedom to Speak Up (Whistleblowing) Policy
- Equality, Diversity & Inclusion Policy
- Information Governance Policy
- Incident Reporting Policy
- Supplier Code of Conduct

Together these policies establish clear expectations for all workers and suppliers.

4. Ethical Recruitment

Preventing exploitation begins with safe recruitment.

EHG operates a robust Workforce Compliance Framework which ensures every worker undergoes comprehensive pre-employment checks before deployment.

These include:

- Identity verification
- Right to Work checks
- Enhanced DBS (where appropriate)
- Professional registration verification (GMC, NMC, HCPC)
- Employment history review
- Two satisfactory references
- Occupational Health clearance
- Mandatory training compliance
- Professional indemnity verification

We do not:

- Charge recruitment fees.
- Retain passports or personal identity documents.
- Permit unlawful deductions from wages.
- Use recruitment practices inconsistent with UK employment legislation.

International recruitment is conducted in accordance with the NHS Code of Practice for International Recruitment.

5. Supply Chain Due Diligence

EHG recognises that modern slavery risks may exist within supply chains.

Accordingly, we undertake proportionate due diligence before engaging suppliers and expect all organisations working on our behalf to:

- Comply with the Modern Slavery Act 2015.
- Operate ethical recruitment practices.

- Undertake Right to Work checks.
- Maintain safeguarding arrangements.
- Operate Freedom to Speak Up processes.
- Cooperate with audits where requested.

Supplier compliance is monitored through contractual obligations, governance meetings and periodic review.

Where concerns arise, corrective action plans are implemented and, where necessary, contractual relationships may be suspended or terminated.

6. Training & Awareness

Preventing modern slavery relies upon an informed workforce.

All workers complete mandatory training appropriate to their role, including:

- Modern Slavery Awareness
- Safeguarding Adults
- Safeguarding Children
- Prevent
- Equality, Diversity & Inclusion
- Information Governance
- Freedom to Speak Up

Managers receive additional training covering workforce assurance, safeguarding responsibilities and escalation procedures.

7. Reporting Concerns

Every worker has a professional responsibility to report concerns relating to modern slavery or exploitation.

Concerns may be raised through:

- Line Management
- Safeguarding Lead
- Clinical Governance Lead
- Freedom to Speak Up Guardian
- NHS Trust or Local Authority safeguarding teams
- Police
- Modern Slavery & Exploitation Helpline

All reports are investigated proportionately, confidentially and in accordance with safeguarding legislation and organisational governance procedures.

8. Monitoring & Continuous Improvement

Modern slavery prevention forms part of the Group's wider Corporate Governance Framework.

During the reporting period, assurance has been obtained through:

- Workforce compliance audits
- Supplier due diligence reviews
- Safeguarding audits
- Mandatory training compliance monitoring
- Governance meetings
- Incident review
- Freedom to Speak Up reporting
- Annual policy review

Learning from audits, incidents and feedback informs continual improvement across the organisation.

9. Looking Ahead

During the next reporting period, Eleventh Hour Group will continue to strengthen its approach by:

- Reviewing supplier assurance arrangements.
- Expanding workforce awareness training.
- Enhancing governance reporting.
- Reviewing corporate policies against emerging NHS guidance.
- Continuing to embed ethical recruitment and safeguarding across all Group companies.

We remain committed to working collaboratively with NHS organisations, Local Authorities and our wider supply chain to prevent exploitation and uphold the highest standards of patient safety, workforce welfare and corporate responsibility.

This statement has been approved by the Executive Leadership Team of Eleventh Hour Group in accordance with Section 54 of the Modern Slavery Act 2015.

Approved by	Position
Greg Wood	CEO & Clinical Governance Lead
Shaun Winsall	Director of Services

Date 05/04/2026