

# HC INNOVATIONS MANAGEMENT SYSTEM



Document Title: POL12 Modern Slavery Policy – Version 1 - 21042024  
Responsibility: Senior Management

**SCOPE**

This policy applies to the Integrated Management System (IMS) operated by HC Innovations Ltd.

**RESPONSIBILITY**

**Senior Management**  
Senior Management is responsible for keeping this policy up to date.

**DOCUMENT HISTORY**

Issue	Date	Details of amendment / change	Responsibility
1	21/04/24	First Issue	Management



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## Quality Policy

HC Innovations Ltd (HCI) is committed to using its powers, influence and responsibilities to prevent and act against modern slavery.

Modern slavery has a devastating and long lasting impact on victims and is often a hidden crime undetected for years. Types of slavery include child trafficking, forced labour, debt bondage, sexual exploitation, criminal exploitation and domestic servitude.

There is no typical victim of slavery. Victims are men, women and children of all ages, ethnicities and nationalities and cut across the population. However, it's normally more prevalent among the most vulnerable or within minority or socially excluded groups.

The fight against modern slavery is complex. There is the need to identify and support victims, safeguard individuals, bring perpetrators to justice, develop information and data flows, increase awareness and create long-term, sustainable changes to behaviours, practice, skills and expertise. No single agency can eradicate modern slavery alone and so it is vital that organisations collaborate and share information.

The Modern Slavery Act 2015 The Modern Slavery Act 2015 places specific responsibilities on organisations to ensure slavery and human trafficking does not exist within its supply chain or in any part of its own business. Though some people may be more vulnerable to exploitation than others, it is not restricted by age, gender or background. The term 'modern slavery' captures a whole range of exploitation, which may occur together to have a combined effect on people's rights and liberty. These include, but are not limited to:

- **Child slavery** - in addition to forced child labour, this can involve child trafficking, forced marriage and child domestic servitude.
- **Criminal exploitation** - exploitation of a person to commit a crime or combination of crimes.
- **Domestic servitude** – enforced work in a private household, usually performing domestic chores and childcare duties. **Forced labour** – people forced to work long hours for little or no pay, in poor conditions and under threat of violence to themselves or their families.
- **Sexual exploitation** - including sexual abuse, forced prostitution and the production of child pornography.
- **Trafficking** - involving the transportation, recruitment, receipt or harbouring of people for purposes of exploitation using immoral means, including violence, threats, deception, coercion, abduction or bribery.

Activity within HCI's Suppliers – In-house training on modern slavery is provided to staff on induction and then annual refresher training. HCI staff are to record key performance indicators as specified under ISO9001 to measure progress in tackling modern slavery. As part of the procurement process, suppliers are required to agree a statement relating to modern slavery based on suppliers and contractors understanding their obligations under the Modern Slavery Act 2015. Particular attention must be taken to areas of the supply chain where risks of modern slavery are highest. HCI requires suppliers to demonstrate their commitment to ensuring that slavery and human trafficking are not taking place in their own business, sub-contractors and supply chains.

Equality - HCI is committed to challenging discrimination, harassment and victimisation or any conduct prohibited by the Equality Act 2010.

HCI's Policies - Policies that can support the company's commitment to addressing modern slavery are:

- Equality Policy POL03
- Ethical Policy POL04
- Privacy Policy POL06

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This statement constitutes HCI’s slavery and human trafficking statement.

A handwritten signature in blue ink that reads 'Andrew Davis'. The signature is written in a cursive style with a large initial 'A'.

**Andrew Davis**

**Director**

**April 2024**