



Modern Slavery and Human Trafficking Statement 2026/27

GP Care UK Limited trading as Cohese Healthcare

Company registration number: 06517384

Registered office: 160 Aztec West, Almondsbury, Bristol, BS32 4TU

Care Quality Commission provider ID: 1-127835449

Reporting period: 1 April 2026 to 31 March 2027

1. Introduction and commitment

GP Care UK Limited, trading as Cohese Healthcare, is committed to conducting its business ethically, responsibly and with integrity.

We take a zero-tolerance approach to modern slavery and human trafficking. We are committed to preventing modern slavery within our organisation and to taking proportionate steps to identify, assess and address risks within our supply chains.

Modern slavery may include slavery, servitude, forced or compulsory labour, human trafficking, debt bondage, deceptive recruitment, child labour and other forms of exploitation.

Everyone working for us or on our behalf has a responsibility to support the prevention, detection and reporting of modern slavery. Employees, workers, contractors and suppliers must not engage in, facilitate or knowingly fail to report suspected modern slavery or exploitation.

GP Care UK Limited's annual turnover is currently below the £36 million threshold at which publication of a statement is required under section 54 of the Modern Slavery Act 2015. We have nevertheless chosen to publish this statement voluntarily, recognising our responsibilities as a healthcare provider and NHS supplier.

2. Our organisation, business and supply chains

Cohese Healthcare is the trading name of GP Care UK Limited, a private limited company registered in England and regulated by the Care Quality Commission.

We provide commissioned healthcare services, including NHS-funded clinical services, and work with healthcare commissioners, NHS organisations, clinical professionals, suppliers and other service partners.

Our supply chains are primarily connected with the delivery and support of healthcare services and may include:

- clinical workforce and recruitment providers;
- healthcare professionals and specialist service providers;
- medical equipment and clinical consumables;
- medicines and pharmacy-related services, where applicable;
- information technology, software and digital service providers;
- professional, consultancy and training services; and
- office equipment and general business supplies.

Our direct operations are based in the United Kingdom. Some goods, equipment or components purchased from UK-based suppliers may originate from, or include materials manufactured in, other countries. We recognise that risks may therefore extend beyond the location of our direct suppliers.

3. Governance and accountability

The Board of Directors has overall responsibility for GP Care UK Limited's approach to modern slavery and for approving this statement.

Executive and operational leaders are responsible for ensuring that appropriate controls are implemented within their areas of responsibility.

Managers involved in recruitment, procurement, supplier selection, contract management, safeguarding and workforce management have particular responsibilities for identifying and escalating concerns.

All employees and workers are expected to:

- comply with relevant organisational policies;
- remain alert to signs of exploitation or coercion;
- report concerns promptly; and
- cooperate with any investigation.

The organisation reviews this statement annually and considers whether changes to its activities, workforce or supply chains require additional controls.

4. Relevant policies and procedures

Our approach to preventing modern slavery is supported by policies and procedures relating to:

- recruitment and selection;
- equality, diversity and inclusion;
- safeguarding adults and children;
- raising concerns policy;

- Freedom to Speak Up arrangements;
- standards of business conduct;
- procurement and financial governance;
- employee conduct and professional responsibilities; and
- supplier and contract management.

These arrangements support fair and lawful employment practices, ethical conduct, appropriate safeguarding and the confidential escalation of concerns.

Relevant policies are communicated to employees and reviewed through the organisation's established governance processes.

5. Employment and recruitment controls

We seek to ensure that everyone working directly for GP Care UK Limited does so voluntarily, lawfully and without coercion.

Our recruitment and workforce controls include:

- checking the identity of directly employed workers;
- undertaking right-to-work checks in accordance with UK legal requirements;
- completing pre-employment checks appropriate to the role;
- providing written information about employment terms and conditions;
- paying employees through recognised banking arrangements;
- applying fair employment terms and conditions;
- maintaining routes through which employees can raise concerns;
- applying safeguarding and professional conduct requirements; and
- seeking appropriate assurance when engaging agency or temporary workers.

Where workers are supplied through recruitment agencies or workforce providers, we expect those organisations to conduct appropriate identity, eligibility and pre-employment checks and to comply with applicable employment and modern slavery legislation.

6. Assessment of modern slavery risk

We apply a proportionate, risk-based approach to modern slavery.

We consider our directly employed workforce to present a relatively low risk because it is subject to formal recruitment, identity, right-to-work, payroll and employment controls. However, we recognise that no organisation or supply chain should be treated as risk-free.

Potentially higher-risk areas may include:

- temporary, agency or subcontracted labour;

- complex or multi-tiered supply chains;
- medical consumables or equipment manufactured internationally;
- suppliers operating in countries or sectors associated with weaker labour protections;
- unusually low-cost bids that may indicate unsustainable labour practices;
- restrictions on a worker's freedom of movement or retention of identity documents;
and
- workers who appear frightened, controlled, indebted or unable to speak freely.

Risk is considered as part of supplier selection, onboarding and ongoing management, proportionate to the nature, value, location and complexity of the goods or services being procured.

7. Supplier due diligence

We expect suppliers, subcontractors and other business partners to comply with applicable modern slavery, human trafficking, employment and human rights legislation.

Our proportionate supplier assurance arrangements may include:

- assessing the nature and location of the goods or services being supplied;
- reviewing publicly available supplier information;
- considering whether a supplier is required to publish a modern slavery statement;
- reviewing relevant policies, certifications or assurance information;
- asking proportionate questions about employment and labour practices;
- obtaining assurance about the use of agencies and subcontractors;
- including relevant legal, ethical conduct or modern slavery provisions in contractual documentation;
- requiring material concerns or incidents to be reported;
- considering identified modern slavery risks during contract management; and
- escalating higher-risk or unresolved concerns for management review.

Where proportionate to the assessed risk, suppliers may be asked to provide further evidence of their recruitment practices, workforce controls, supply-chain arrangements, modern slavery commitments and compliance with applicable legislation.

We reserve the right to seek corrective action where a supplier's arrangements do not meet our reasonable expectations. Where a serious concern is identified, we may suspend activity, reconsider the relationship, notify the appropriate authority or take other proportionate action.

Any decision affecting a supplier relationship will take account of the potential impact on affected workers. Immediate termination will not automatically be treated as the most appropriate response if it could place workers at greater risk.

8. Reporting and responding to concerns

Employees and workers must report any concern that modern slavery, human trafficking or exploitation may be taking place within our organisation or supply chain.

Concerns may be raised through:

- a line manager;
- the organisation's safeguarding arrangements;
- the Raising Concerns or Whistleblowing Policy;
- Freedom to Speak Up arrangements; or
- another appropriate senior manager.

Concerns raised in good faith will be treated seriously and handled sensitively. Individuals will not suffer detriment for raising a genuine concern.

Where a concern is reported, we will take proportionate steps to:

1. protect any person who may be at immediate risk;
2. preserve relevant information and evidence;
3. escalate the matter through safeguarding, governance or executive arrangements;
4. investigate or seek specialist advice where appropriate;
5. cooperate with law enforcement, statutory agencies, commissioners or regulators where required; and
6. review whether additional controls or remedial actions are necessary.

Where there is an immediate risk to life or safety, the emergency services should be contacted. Suspected modern slavery may also be reported to the police or the Modern Slavery and Exploitation Helpline.

9. Training and awareness

We recognise that policies alone are not sufficient and that employees must be able to recognise and respond to potential indicators of exploitation.

Relevant awareness is supported through organisational arrangements including:

- safeguarding training appropriate to employees' roles;
- recruitment and right-to-work procedures;
- raising concerns and whistleblowing information;
- equality, diversity and inclusion arrangements;
- induction and mandatory training requirements; and
- guidance for managers with recruitment, procurement, contract-management or safeguarding responsibilities.

We will consider whether additional targeted modern slavery awareness or procurement training is required in response to changes in risk, guidance, services or supply-chain arrangements.

10. Monitoring effectiveness

We monitor the effectiveness of our arrangements using information available through our established governance and assurance processes.

Relevant indicators may include:

- completion of required safeguarding and compliance training;
- completion of identity, right-to-work and pre-employment checks;
- outcomes from recruitment and workforce assurance activities;
- supplier due-diligence and contract-management activity;
- the number and nature of modern slavery-related concerns identified;
- safeguarding, whistleblowing or Freedom to Speak Up concerns relating to exploitation;
- actions taken in response to identified supplier risks;
- internal audit or governance findings, where applicable; and
- progress against improvement actions.

For the reporting period covered by this statement, the organisation will maintain an appropriate record of any material modern slavery concerns identified and the actions taken in response.

Where no incidents are reported, this will not in itself be treated as conclusive evidence that no risk exists. We will continue to promote awareness and accessible reporting routes.

11. Priorities for continuous improvement

During the period covered by this statement, GP Care UK Limited will seek to:

1. maintain effective recruitment, identity and right-to-work controls;
2. keep relevant policies and reporting arrangements under review;
3. strengthen the consistency of proportionate modern slavery considerations within supplier onboarding and contract management;
4. improve the recording of supplier assurance and identified risks;
5. maintain awareness among employees with relevant recruitment, safeguarding, procurement and contract-management responsibilities; and
6. review whether further monitoring measures are appropriate as the organisation and its supply chains develop.

Progress against these priorities will inform the next annual review of this statement.

12. Effectiveness Measures

Indicator	2025/26
Right-to-work checks completed	100%
Staff completing safeguarding training	98.3%
Modern slavery incidents identified	0
Freedom to Speak Up concerns relating to exploitation	0
High-risk suppliers reviewed	0