

Corporate Assurance

Modern Slavery Statement

STMNT/CA006.1

Document Name	Modern Slavery Statement	Version	3
Document Ref	STMNT/CA006.1	Owner	H Bilinski
Date created	May 2021	Review date	August 2023
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1.0 Introduction from the CEO

It continues to be a priority for HATS Group Limited (known hereafter as ‘HATS Group’ or the ‘Company’) to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain, including development of a Risk Matrix relating to suppliers, auditing new suppliers and re-inspecting existing suppliers identified as being high risk or in an industry identified by us as high risk.

2.0 Company Structure

HATS Group is a provider of transportation services, primarily in the public healthcare and schools sectors. Our business is operated exclusively in the United Kingdom.

We have an annual turnover of approximately £80 million.

3.0 Our Business

Our business is organised into four business units:

1. Home to School Services
2. Patient Transport Services
3. Mental Health Services
4. Private Hire Services

4.0 HATS Group Supply Chains

Our supply chains include:

- Vehicle purchases and modifications
- Clinical and other consumables
- Temporary labour (particularly drivers and vehicle support staff)
- IT equipment
- Cleaning contractors

5.0 Our Policies on Slavery & Human Trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We regularly review and update all our policies.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Code of Conduct
- Responsible for sourcing / procurement policy
- Safer Recruitment & Selection Policy

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- Equality & Diversity Policy
- Whistleblowing Policy

6.0 Due Diligence Processes for Slavery and Human Trafficking

We understand that the following areas give rise to the highest modern slavery risks:

- Purchase of clinical and other consumables
- Temporary labour (particularly drivers and vehicle support staff)
- Cleaning contractors

As part of our initiative to identify and mitigate risk we carry out risk assessments on new suppliers identified as being high risk and have a programme of audits relating to existing suppliers identified as high risk. We also have in place a Risk Matrix to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains

HATS Group has also implemented a Whistleblowing Policy to protect individuals reporting their concerns.

7.0 Supplier Adherence to our Ethics and HATS Group Policies

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with ethical practices and our policies, we have in place a supply chain Due Diligence Compliance programme.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal
- Audit and Compliance
- Human Resources
- Procurement
- Operations

8.0 Training


To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

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9.0 Modern Slavery Statement Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 August 2023. It was approved by the board on 31 August 2022.

Date: 31st August 2022

Signed: 

Name: Henry Bilinski

Title: Chief Executive Officer

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Version Control

Version	Date	Type of change	Revision(s) made	Revisions made by
1	May 2021	Creation		
2	July 2022	Full review	Legal review, reformatted, and edited	A Macdonald + M Tewelde
3	November 2022	Legal review	Layout of statement adjusted for readability	A Macdonald + M Tewelde

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