



Primary Eyecare Services

# Modern Slavery Statement

## About Us

Primary Eyecare Services (PES) is the largest single not-for-profit primary eye care lead provider in England. PES contracts with NHS commissioners and trusts to make NHS-funded eyecare services available from local eye care practices, from small independent practices to large national chains. It is an optometry federation which aims to support patients by broadening the eye care services available from local opticians (also known as optometrists).

PES offers a range of specialist NHS eye care services, delivered by accredited optometrists, with appointments at locations and times convenient for all patients. Service availability is dependent on which services each NHS region has commissioned in their local area.

## Our Supply Chains

PES are committed to upholding ethical and sustainable practices in our supply chain. We recognise the importance of taking action to prevent modern slavery and human trafficking in all our operations. We have a zero-tolerance approach to slavery and human trafficking and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. As part of this commitment, we risk assess our supply chain. Our supply chain is made up of a diverse range of third-party providers, many of which are small and medium-sized enterprises (SMEs).

We procure a varied range of services including:

- **Optometry practice clinical services (92%)**
- **IT services and provision (5%)**
- **Other services (3%)**

In line with the updated 2025–2026 Government [guidance](#), PES now provides a clearer definition of our supply chain structure and the scope of our oversight. We acknowledge new expectations for transparency, including describing how our suppliers' practices are monitored, the limitations in our current mapping, and our approach to continuous improvement.

We work closely with our suppliers to ensure that they adhere to our standards. In addition, we provide training and resources to our employees and suppliers to raise awareness of the risks associated with modern slavery and human trafficking. This promotes a culture of ethical behaviour throughout our supply chain.

By taking these proactive measures, and by strengthening transparency in line with updated national guidance, we aim to eliminate the risk of modern slavery and human trafficking in our operations and supply chain. We are committed to continuously improving our practices and working with our partners to create a more sustainable and ethical supply chain for the benefit of all.

# Steps to Tackle Modern Slavery

PES is committed to preventing modern slavery and human trafficking in all of our operations and supply chains. We believe that all forms of exploitation, forced labour, and human trafficking are abhorrent and have no place in our organisation or society.

The steps that we have taken to reduce the risk of modern slavery in our business are:

## Policies

Our commitment to preventing modern slavery and human trafficking is reflected in our policies, procedures, and code of conduct, which are regularly reviewed and updated to ensure they align with our values and legal requirements. We require all our employees, suppliers, and business partners to comply with our policies and standards, and we monitor compliance through regular assessments and audits.

We pay all our employees the Real Living Wage or above. Our grievance, safeguarding, bullying and harassment, and freedom to speak up policies give our employees a platform to raise concerns about poor working practices. We review our employee policies annually. In 2022, we introduced our freedom to speak up policy to reflect this. We require all our suppliers to follow the Government [Supplier Code of Conduct](#).

The updated government's modern slavery guidance encourages referencing human rights standards; PES aligns its approach with the principles of responsible labour practices.

## Risk Assessment

We conduct a risk assessment against all suppliers of our services with processes and protocols in place based on initial risk assessment. Our subcontractor practices must also follow the due diligence processes of the [Public contract Regulations 2015](#) and [Concession Contract Regulations 2016](#). This includes excluding suppliers that have been found in breach of social and labour laws and building in further selection criteria for higher risk contracts.

## Due Diligence

PES Workforce recruitment practices, right-to-work checks, assurance expectations for higher-risk engagements, and clearer escalation routes are all in compliance with the due diligence standards provided in the guidance. We continue to apply [NHS Standard Contract requirements](#).

## Contract terms

Our standard conditions of contract are based on the [NHS Standard Contract requirements](#) in which modern slavery is outlined in section 39.9. This is a requirement across all of our contracts with commissioners and suppliers. This reflects our approach to modern slavery including reserving our right to terminate contracts with suppliers if there is evidence of non-compliance with the Act.

## Training, Awareness raising and Resources

To support our commitment, we provide training and awareness-raising activities for all our employees at PES. This includes training on the signs and indicators on modern slavery, the legal and ethical obligations to prevent and report it, and the importance of respecting human rights and ethical labour practices. The updated guidance encourages transparency in training coverage, and we will now report completion rates and extend training signposts to subcontracted practices.

We also provide guidance and support on how to report any concerns related to modern slavery or human trafficking across PES. This includes our safeguarding policies and freedom to speak up policy, which encourages employees to report any concerns they may have without fear of retaliation.

By providing training and awareness-raising activities for modern slavery, we aim to promote a culture of transparency, accountability, and respect for human rights across our operations and supply chains. We are committed to working with our employees, suppliers, and contractors to ensure that we can identify and address any risks of modern slavery and human trafficking and prevent these practices from occurring in our organisation and supply chain.

Our resources are available and are circulated to all staff within the organisation. This includes videos and training resources to raise awareness such as:

[Modern Slavery and Human Trafficking videos](#) produced by the National Crime Agency Modern slavery training module, 'Identifying and Supporting Victims of Modern Slavery' within the e-learning platform HEE elf-h.

## Conclusion

We recognise that our operations and supply chains are complex, and we may face challenges in identifying and addressing modern slavery risks. We encourage our suppliers to adopt responsible business practices and collaborate with industry organisations and government agencies to promote ethical and sustainable supply chains.

We believe that preventing modern slavery and human trafficking is not only a legal obligation but also a moral imperative, and we will continue to work towards eradicating these crimes in all our operations and supply chains.

We are committed to being transparent about our efforts to prevent modern slavery and human trafficking and to report on our progress. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Signed,



**Dharmesh Patel**  
Chief Executive Officer