

# Modern Slavery Statement & Policy

1.1

Document Type:	Policy & Procedure
Current Status:	Draft
Version:	1.1
Reviewed by:	Lee Busher
Latest review date:	July 2022
Document Owner:	SCW Human Resources (SCW HR)
This version approved:	09 2020
Next review due:	July 2024
Approved by	Kerry Cooper
Original publication date	DD 09 2020
Applies to:	e.g. All Southern Hampshire Primary Care Alliance Staff/Clinical Staff/etc...

## Version Control

Version	Date	Author	Change Summary
1.1	21/07/2022	L Busher	Formatting changes and review

## Contents

modern Slavery And Human Trafficking Statement .....	4
1. Introduction And Purpose .....	5
2. Scope & Definitions .....	5
3. Roles And Responsibilities .....	5
4. Breaches .....	6
5. Staff Support.....	6
6. Dissemination & Training.....	6
7. Equality Analysis .....	6
8. Success Criteria / Monitoring The Effectiveness Of The Policy .....	7
9. Review.....	7
10. References .....	7

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Southern Hampshire Primary Care Alliance (SHPCA) is committed to improving our practices to combat slavery and human trafficking practices in the supply chain and employment practices.

The Modern Slavery Act 2015 has introduced changes in UK law focused on increasing transparency in supply chains, to ensure our supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking).

SHPCA are committed to:

- the highest level of ethical standards and sound governance arrangements and set high standards of impartiality, integrity and objectivity in relation to the management of its activities.
- zero tolerance to corruption and bribery.
- fully supporting the government's objectives to eradicate modern slavery and human trafficking.

Our recruitment processes adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records. Our policies such as Grievance policy, Equality and Diversity policy and Whistleblowing policy provide an additional platform for our employees to raise concerns about poor working practices.

Our procurement approach require suppliers to comply with relevant legislation

# MODERN SLAVERY & HUMAN TRAFFICKING POLICY

## 1. INTRODUCTION AND PURPOSE

- 1.1. SHPCA is committed to improving our practices to combat slavery and human trafficking practices in the supply chain and employment practices.
- 1.2. SHPCA is committed to:
  - 1.2.1 The highest level of ethical standards and sound governance arrangements and set high standards of impartiality, integrity and objectivity in relation to the management of its activities.
  - 1.2.2 Zero tolerance to corruption and bribery.
  - 1.2.3 Fully supporting the government's objectives to eradicate modern slavery and human trafficking.
- 1.3 SHPCA is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all of our business associates, and expect the supply chain to impose the same standards on their own network.
- 1.4 The purpose of this policy is provide information to all persons working for SHPCA in any capacity on how the company deals with modern slavery and the role that all individuals involved with our business must play in ensuring compliance with the Act.

## 2. SCOPE & DEFINITIONS

- 2.1. This policy applies to all members of staff that are employed by SHPCA and those working on a sessional/locum basis in any SHPCA services.
- 2.2. For those staff covered by a letter of authority / honorary contract or work experience this policy is also applicable whilst undertaking duties on behalf of SHPCA or working on SHPCA premises. As part of good employment practice, agency workers are also required to abide by SHPCA policies and procedures, as appropriate, to ensure their health, safety and welfare whilst undertaking work for SHPCA.
- 2.3. The Modern Slavery Act 2015 has been introduced with the aim of stamping out slavery and trafficking and created a number of new criminal offences. The Act also contains a number measures intended to encourage businesses to take steps to address modern slavery.
- 2.4. The Act has introduced changes in UK law focused on increasing transparency in supply chains, to ensure our supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking).
- 2.5. Modern slavery is a violation of fundamental human rights. It may take various forms, such as servitude, forced and compulsory labour and human trafficking. Illegal practice permeates many aspects of the legitimate economy with construction one of the industries subject to its influence.

## 3. ROLES AND RESPONSIBILITIES

- 3.1. All our employees must read, understand and comply in all respects with this policy. Any activity which could lead to or suggest a breach of this policy is strictly prohibited. It is the responsibility for all those

that work for or within SHPCA to ensure the prevention, detection and reporting of any possible breaches of this policy within any part of our business, including all members of our supply chain and business partners.

- 3.2. All our employees are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage. SHPCA promotes openness and transparency so that any person that raises a genuine concern in good faith under this policy will be supported by the business, even if they turn out to be mistaken. We will investigate all genuine concerns which are raised in connection with this policy and our employees know that they can act without any fear of reprisal.
- 3.3. If an employee believes or suspects that there has been a breach of this policy, or a breach may occur in the future, they must notify their line manager and SCW HR as soon as possible.
- 3.4. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion they might have.

## **4. BREACHES**

- 4.1. Any employee found to be in breach of this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 4.2. We may terminate our relationship with other individuals and organisations working on our behalf if they are found to be breach this policy.

## **5. STAFF SUPPORT**

- 5.1. The manager where appropriate should provide advice of workplace support such as occupational health services, and the Employee Assistance Programme (EAP) 0800 783 2808 which is available 24-hours a day and is confidential and anonymous.

## **6. DISSEMINATION & TRAINING**

- 6.1. The effective implementation of this procedural document will support openness and transparency. SHPCA will:
  - 6.1.1. Ensure all staff and stakeholders have access to a copy of this procedural if requested
  - 6.1.2. Develop a culture where employees can discuss concerns they may have regarding modern slavery and human trafficking.
- 6.2. Staff requiring training or support should speak to their line manager in the first instance.

## **7. EQUALITY ANALYSIS**

- 7.1. This policy supports the upholding of the Human Rights of each individual working in the SHPCA.
- 7.2. In applying this policy, SHPCA will have due regard for the need to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race,

religion or belief, and sexual orientation, in addition to offending background, trade union membership, or any other personal characteristic.

**7.3.** Where English is not the first language or there are difficulties in reading this policy, employees should contact their line manager or Human Resources for advice and guidance.

**7.4.** In line with SHPCA policy, an equality analysis has been completed. It is understood that no employee will receive less favourable treatment on the grounds of disability, age, sex, race, religion or belief, gender reassignment, pregnancy or maternity, marriage or civil partnership, working patterns or trade union membership or non-membership in relation to the application of this policy.

## **8. SUCCESS CRITERIA / MONITORING THE EFFECTIVENESS OF THE POLICY**

**8.1.** SHPCA will review any incidents that may have occurred which are related to this policy.

**8.2.** Any subsequent issues identified will be incorporated in the new version of the policy.

## **9. REVIEW**

**9.1.** This policy may be reviewed at any time at the request of staff or but will be reviewed automatically in the event of new legislation or guidance emerging or annually.

## **10. REFERENCES**

**10.1.** Further information can be found on how to report modern slavery, support and more by accessing: <https://www.gov.uk/government/collections/modern-slavery>