

Policy Title	POL-HN-16 Slavery and Human Trafficking Policy
Version	02
Date of issue	18 th June 2021
Effective Date	18 th July 2022
Version Originator	Carol-Ann Martin
Reviewed by	Kim Broadway
Approved by	Kerry Hinton
Review date	18 th June 2022

1. PURPOSE OF POLICY

HealthNet recognises its legal responsibilities as contained in the Modern Slavery Act 2015. This policy sets out the principles and values which focus on increasing transparency in supply chains.

2. POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are 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 Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. PRINCIPLES

HealthNet is committed to creating an organisation that:

- i. complies with legislation and regulatory requirements in this area
- ii. makes suppliers and sub-contractors aware that we promote the requirements of this legislation
- iii. considers modern slavery factors when making business decisions
- iv. develops awareness of modern slavery issues throughout HealthNet
- v. complies with and uses NHS Terms and Conditions for Goods and Services which require us to comply with all relevant legislation and guidance, including modern slavery conditions
- vi. encourages suppliers and sub-contractors to take their own actions and understand their obligations under this legislation
- vii. ensures modern slavery is included in safeguarding work plans wherever appropriate
- viii. ensures staff undertake mandatory safeguarding training, and training in equality, diversity, and human rights
- ix. ensures appropriate staff also receive regular briefings and appropriate training so that they are aware of legislative requirements in this area

4. STAFF DUTIES AND RESPONSIBILITIES

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

5. ACCOUNTABILITY AND RESPONSIBILITY FOR THIS POLICY

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that those under our control comply with it.

The Chief Executive Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Human Resources Function.

The Company is bound by the acts and/or omissions of its employees. Employees should understand that acts and/or omissions in contravention of the Modern Slavery Act could result in serious repercussions for the Company.

The **HR Manager** is responsible for:

- i. ensuring the Company recruitment processes are robust and adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records.
- ii. Ensuring Company policies such as Safeguarding Adults and Children policies, Bullying and Harassment policy, Grievance procedure and Raising a Concern policy provide an additional platform for our employees to raise concerns about poor and inappropriate working practices.

All **Staff** are responsible for:

- iii. Supporting the HR Manager in his/her responsibilities and reporting any concerns they have about the recruitment process in respect of the Modern Slavery Act
- iv. acting in ways that are in accordance with this policy and with Company values
- v. undertaking relevant modern slavery training
- vi. informing their manager if they become aware of any behaviour that undermines equality and diversity

6. COMPLIANCE WITH THE POLICY

You must ensure that you read, understand, and comply with this policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or the Human Resources Function as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or the Human Resources Function as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Human Resources Function.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers

any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager or the Human Resources Function immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in The Company Handbook.

7. POLICY IMPLEMENTATION

To achieve the implementation of this policy, HealthNet intends:

- i. to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the supply chains of our providers
- ii. wherever possible work with NHS CCGs, Purchasing Authorities and Pharmaceutical Companies in the commissioning process to support multi-agency work to respond to modern slavery and human trafficking
- iii. to gain assurance that all commissioned services have access to training on how to identify those who are victims of modern slavery and human trafficking
- iv. to continue working with NHS funded and partner organisations to ensure modern slavery and human trafficking are appropriately prioritised and feature prominently in safeguarding work plans.

8. COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided, as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

9. BREACHES OF THIS POLICY

Any employee who breaches this policy may face disciplinary action, which could, depending upon the circumstance result in a sanction ranging from remedial training to dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

10. MONITORING THIS POLICY

This policy will be reviewed every 12 months and upon significant internal or external changes to the approach to Modern Slavery.

11. REVISION HISTORY

Version 00	New Policy
Version 01	Change of review cycle to annually: <i>Section 54 of the Modern Slavery Act 2015 requires commercial organisations carrying out business in the UK, with a turnover of at least £36 million, to prepare and publish a slavery and human trafficking statement for every financial year.</i>
Version 02	Annual review of Policy: Signatories of “Originator” and “Reviewed by” have been replaced with HR and Quality representation.

		Signed	Date
Version	Originator	 <small>Carol-Ann Martin (Jun 18, 2021 14:22 GMT+1)</small>	Jun 18, 2021
	Reviewed by		Jun 18, 2021
	Approved by	 <small>K. Hinton (Jun 21, 2021 09:22 GMT+1)</small>	Jun 21, 2021