

## Modern Slavery Act 2015

### Introduction

This statement sets out Provide's actions to understand all potential modern slavery risks related to its business. It highlights steps taken ensure there is no slavery or human trafficking in its own business and its supply chains. The organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Organisational structure and supply chains

Provide delivers a broad range of community health and social care services in England across Essex, Cambridgeshire and Peterborough, as well as the London boroughs of Waltham Forest and Redbridge. Provide employ approximately 1200 staff including Medical Staff and other professionally registered staff including nurses and Allied Health Professionals. We also employ non clinical professionally registered staff within our support functions in addition to administrators and clinical support staff.

We do not manufacture clinical products or equipment, but source these from reputable supply companies however as customers, we recognise the active role we play in ensuring our suppliers are also committed to preventing slavery and human trafficking.

Due to the scope of our business Provide CIC recognises that we may be at risk of Slavery and Human Trafficking and commits to developing and adopting a proactive approach to tackling hidden exploitation.

### Relevant policies

Provide operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- **Freedom to Speak Up (Whistleblowing policy HR POL1)** Provide CIC encourages all workers, to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's Freedom to Speak Up procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, or others who have concerns can contact our Safeguarding Team, raise concerns with named Executives or Non-Executive Board members or contact the Modern Slavery Helpline. Contact details for all three routes are given in this policy.
- **[Supplier/Procurement] code of conduct.** The organisation is committed to ensuring that its suppliers adhere to the highest

standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. All suppliers are contractually obliged to confirm that all of their staff have right to work in the UK and be fit to practice. Our subcontractors are contractually obliged to work to all of Provide's policies and procedures which help support our efforts to reduce the risk around slavery.

- **Engagement of Agency & Contractors Policy** – Provide CIC uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Agencies complete additional checks that agency workers meet certain standards. These checks include the right to work in the UK and where applicable DBS, health clearance and fitness to practice.
- **Domestic Violence & Multi-Agency Risk Assessment Policy SGPOL08** – Provide CIC has a policy setting out the responsibility of our staff to be alert for signs of modern slavery when delivering services to our customers. This policy gives a range of contact points for advice and help.

### **Risk Assessment**

Recruitment has been assessed as low risk. Provide CIC do not actively recruit from abroad and undertake full NHS Employment Check Standards.

### **Performance indicators**

The organisation requires all staff to have completed training on modern slavery at corporate induction.

### **Training**

The organisation requires all staff within the organisation to complete training on modern slavery. All staff are required to undertake Level One, Two or Three safeguarding training which covers anti-slavery and modern day trafficking at each level, commensurate with job role and responsibilities. This is in line with the intercollegiate document (RCPCH 2014).

The organisation's modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;

**Awareness-raising programme**

As well as training staff, the organisation has raised awareness of modern slavery issues by distributing and displaying posters drawing attention to our Freedom to Speak up Policy.

Provide has distributed the relevant policies via a system of Meta-compliance which is a system of requiring staff to read policies via a 'pop-up' message which appears when they log on to their computer.

Provide CIC have implemented the following steps during the current financial year covering 2016 – 2017 to reduce the risk to both us and people using our services:

- Reviewed the Freedom to Speak Up Policy to ensure the requirement to prevent Modern Slavery is clearly referenced within it.
- Distributed the Freedom to Speak Up Policy to staff via a system that requires staff to confirm they have read the documents.
- Corporate Induction covers the principles of Modern Day Slavery and Human Trafficking as part of safeguarding processes.

**Board approval**

This statement has been approved by the organisation's board of directors who will review and update it annually.

**Chairman's signature:**A handwritten signature in red ink, appearing to read 'Derrick Louis', with a horizontal line underneath.**Chairman's name:**

Derrick Louis

**Date:**

2<sup>nd</sup> December 2016