

<b>Policy Title</b>	<b>POL-HN-16 Slavery and Human Trafficking Policy</b>
<b>Version</b>	01
<b>Date of issue</b>	21 <sup>st</sup> June 2020
<b>Version Originator</b>	Mike Gordon
<b>Reviewed by</b>	Sue Lee
<b>Approved by</b>	Kerry Hinton
<b>Review date</b>	21 <sup>st</sup> June 2021

**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.

Modern slavery and human trafficking statement:

*Modern slavery is the recruitment, movement, harbouring or receiving of children, women, or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of, or within the UK. They may be trafficked for multiple reasons, including sexual exploitation, forced labour, domestic servitude and organ harvesting.*

The Modern Slavery Act 2015 introduced changes in UK law which focus on increasing transparency in supply chains.

HealthNet is committed to improving our practices to combat slavery and human trafficking. We are committed to ensuring there is no modern slavery or human trafficking in any part of our business and in so far as is possible, to requiring our suppliers and sub-contractors have a similar ethos.

**2. 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

### **3. STAFF DUTIES AND RESPONSIBILITIES**

This policy applies to everybody who works in the Company.

### **4. ACCOUNTABILITY AND RESPONSIBILITY FOR THIS POLICY**

The **Chief Executive** is responsible for ensuring the effective implementation and management of this policy. 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

### **5. POLICY**

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.

**6. MONITORING THIS POLICY**

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

**7. COMPLAINTS**

Any employee who wishes to make a complaint about the application or non-application of this policy should raise the matter through the Company’s Grievance procedure.

Any prospective employee or other workers not directly employed by the Company should make their complaint using the Company’s Complaints Procedure.

**8. SANCTIONS**

Breach of this policy could lead to disciplinary action. Depending on the circumstances this could range from remedial training to dismissal.

**9. 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>

		Signed	Date
<b>Version</b>	<b>Originator</b>	 Sue Lee (Superintendent Pharmacist)	Jun 22, 2020
	<b>Reviewed by</b>	 Mike Gordon (Jun 22, 2020 12:21 GMT) Mike Gordon (Chairman)	Jun 22, 2020
	<b>Approved by</b>	 K.Hinton (Jun 22, 2020 12:08 GMT+1) Kerry Hinton (CEO)	Jun 22, 2020