

## Modern Slavery Act 2015

### Modern Slavery and Human Trafficking Statement 2017/18

This statement sets out East Coast Community Healthcare's (ECCH) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement sets out ECCH's commitment to preventing Modern Slavery and Human Trafficking and relates to actions and activities during the financial year 1 October 2017 to 30 September 2018.

#### 1. Organisational Structure

East Coast Community Healthcare CIC (ECCH) is a social enterprise with an annual turnover above £36 million. ECCH provides a comprehensive range of NHS community health services across Norfolk and Suffolk. As a social enterprise, ECCH is owned by its staff and uses any surplus resources for the benefit of communities in Norfolk and Suffolk. We employ approximately 800 staff including professionally registered staff (e.g. nurses and Allied Health Professionals), clinical support staff, administrative staff and business support staff. Further details about ECCH's activities can be found on our website - <https://www.ecch.org/>

We do not manufacture clinical products or equipment, but source these from reputable supply companies. As a commissioner of services/ customer, however, we recognise the active role ECCH has to play in ensuring our suppliers are also committed to preventing slavery and human trafficking.

Due to the scope of our social enterprise, ECCH recognises that it may be at risk of supporting slavery and human trafficking through its supply chain and commits to developing and adopting a proactive approach to tackling hidden exploitation.

#### 2. Our Policy on Modern Slavery and Human Trafficking

ECCH fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role we play in its prevention. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

ECCH has internal policies and procedures in place that address the potential for modern slavery and human trafficking. All staff are responsible for the successful prevention of modern slavery and human trafficking.

We confirm the identities of all new employees and their right to work in the United Kingdom and ensure all employees are remunerated in accordance with statutory requirements.

#### 3. High-risk activities

ECCH has identified that the area of its activities at the highest risk of slavery or human trafficking is in its procurement and supply chain.

To identify and mitigate the risks of modern slavery and human trafficking in ECCH and its supply chains ECCH:

- Purchases products through the NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour;
- ECCH requests all its suppliers to comply with the provisions of the UK Modern Slavery Act (2015), especially where it is not purchasing through the NHS Supply Chain, through inclusion of a statement within tender specifications, new contract arrangements and renewed contracts. This spells out our commitment to ensuring that no modern slavery or human trafficking is related to our business;
- Where possible, builds long standing relationships with suppliers.

#### 4. Relevant policies

ECCH operates according to the following the principles and policies which describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- **Whistleblowing policy** - ECCH encourages all its workers, customers and other business partners 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. ECCH's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use the ECCH CONFIDENTIAL HELPLINE – 01502 448611 or, for employees, complete our confidential disclosure form, which can be found on ECCH's intranet 'ECCHO' at <http://eccho/Portals/1/Policies%202017/Whistleblowing%20Policy%20-%20Version%2011%20-%20FINAL.pdf>
- **ECCH Signature Behaviours and Commitments** – ECCH's Signature Behaviours and Commitments are owned by our staff and they clearly define the actions and behaviour expected when representing the organisation. ECCH strives to maintain the highest standards of employee conduct and ethical behaviour in every sphere of its operations and in managing its supply chain.
- **Engagement of Agency and Contractors** – ECCH 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 to ensure that certain standards are met. These checks include the right to work in the UK and where applicable DBS, health clearance and fitness to practice.

#### 5. Due Diligence

ECCH undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation is developing a system of due diligence and reviews which will include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each supplier;

- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;

## **6. Training**

ECCH has a mandatory requirement for all staff to complete Level 1 and Level 2 Training in Safeguarding Adults. Face-to-face/classroom/eLearning delivery of this course trains staff in understanding and identifying and responding to those who are, or who are at risk of being, victims of modern slavery and human trafficking.

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.

## **7. Progress in 2016/17**

ECCH staff are required as part of their mandatory training to complete either Level 1 or Level 2 Training in Safeguarding Adults. Overall compliance with this requirement was 88.2% at 1 October 2017.

ECCH confirms the identities of all new employees and their right to work in the United Kingdom and ensure all employees are remunerated in accordance with statutory requirements.

To date, we have not identified any areas of our supply chain where risk exists. ECCH continues to review its supply chain to confirm suppliers' compliance with the provisions of the UK Modern Slavery Act – see below.

## **8. Action for 2017/18**

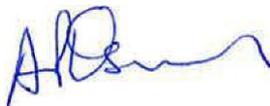
Over the next year ECCH will:

1. Take further steps to identify, assess and monitor potential risk areas, particularly in our supply chains;
2. Complete the review of all supply chain contracts to gain assurance from suppliers that they have taken reasonable steps to prevent modern slavery and human trafficking;
3. Review the ECCH's Procurement Policy to ensure that there is clarity about the need for suppliers to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
4. Ensure anti-slavery clauses are included in all relevant contracts;
5. Improve % of staff completing relevant mandatory training;
6. Review the content of mandatory staff training relating to modern slavery and human trafficking;

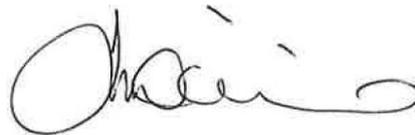
7. Ensure appropriate training for contract managers and those responsible for recruitment so that they are better equipped to identify and prevent slavery and human trafficking;
8. Raise awareness amongst staff of modern slavery issues by posting information across the organisation's premises and in its staff e-news bulletin setting out the basic principles of the Modern Slavery Act 2015 and what employees can do to flag up potential slavery or human trafficking issues within the organisation;
9. Monitor progress through reports to the Integrated Governance Committee.

## 9. Board of Directors' Approval

The Board of Directors have considered and approved this statement and will continue to support the requirements of the legislation.



Tony Osmani  
Chair



Jonathan Williams  
Chief Executive Officer