Modern Slavery and Human Trafficking Statement for reporting year 2022/203 as required by the Modern Slavery and Human Trafficking Act 2015.

Definition of Offences

Slavery, Servitude and Forced or Compulsory Labour

A person commits an offence if:

- The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

Human Trafficking

A person commits an offence if:

- The person arranges or facilitates the travel of another person (victim) with a view to being exploited.
- It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

Exploitation

A person is exploited if one or more of the following issues are identified in relation to the victim:

- Slavery, servitude, forced or compulsory labour.
- Sexual exploitation
- Removal of organs
- Securing services by force, threats and deception
- Securing services from children, young people and vulnerable persons.

Modern Slavery and Human Trafficking Statement

Sirona care & health is a social enterprise delivering publicly funded NHS healthcare services for adult and children in the Bristol, North Somerset, and South Gloucestershire (BNSSG) region. We provide over 50 different services, and we employ up to 4,000 highly skilled staff to deliver these services.

We strive to make a positive social impact across our areas of provision, and we are committed to making a long-term difference to the many different social and cultural communities we serve, which includes a key strategic objective to focus on people from all backgrounds within the diverse neighbourhoods of our communities as detailed within the Sirona Vision of Improved Outcomes for All.

In accordance with the Modern Slavery Act 2015, Sirona care & health CIC makes the following statement regarding the steps it is taking in the financial year 2022/2023 to ensure that Modern Slavery i.e. slavery and human trafficking, is not taking place in any part of its own business or any of its supply chains. Our approach is rooted in the principles of the Universal Declaration of Human Rights and core International Labour Organisation (ILO)

Sirona is committed to ensuring that there is no Modern Slavery or Human Trafficking in our supply chains or in any part of our business.

We are committed to social and environmental responsibility and have zero tolerance for Modern Slavery and Human Trafficking. Any identified concerns regarding Modern Slavery and Human Trafficking are escalated as part of the organisations safeguarding protocols, working in conjunction with our partner agencies.

According to the Modern Slavery and Human Rights Policy and Evidence Centre, the Covid-19 pandemic “has increased vulnerability to modern slavery worldwide as many underlying drivers have worsened.” These drivers include poverty, inequality, and unemployment, things which could continue to get worse with the current Cost of Living crisis.

Training and Policies in relation to slavery and human trafficking

- Human trafficking and modern slavery guidance is covered within Sirona’s safeguarding mandatory training from Levels 1-3 for Children and Levels 1-2 for Adult’s
- The response to human trafficking and modern slavery concerns are coordinated under the safeguarding adult and/or safeguarding children process. The Police are the lead agency (a national framework is in place to assist in the formal identification and help to coordinate the referral of victims to appropriate services, known as the National Referral Mechanism).
- The referral process for adults/ children at risk and links to both Sirona Safeguarding Adults (Local Safeguarding Adults Board) are located on the safeguarding section of the Sirona website.
- Sirona has systems and policies in place to encourage the reporting of concerns

and the protection of whistle blowers and in addition has dedicated named adult and children's safeguarding leads plus numerous dedicated Freedom to Speak Up Guardians. These systems and policies cover concerns about illegal practices, including possible modern slavery.

- Sirona takes a unified corporate approach to the development, management, and approval of policies to make sure that the information is presented in a standard format, can be easily accessed by staff and that the drafting, ratification and review process is clear to all.

- A review is undertaken of all safeguarding referrals via the Sirona incident reporting system and presentation of data is shared at the Quality and Outcomes Board Sub-Committee and Safeguarding Committee.

Sirona staff

Employment

- Sirona carries out robust recruitment processes in line with relevant employment laws. Recruitment and selection practices and policies overseen by Sirona's resourcing department

- Sirona Employment Checks are in line with National NHS Employment Check Standards (which include identification, right to work, qualification and registration and reference checks)

- In addition, Sirona requires all external agency engagements to be made via framework approved supplier who are audited centrally and required to confirm that all staff have been checked for their right to work, identification, qualification and registration in line with NHS employment check standards commensurate to NHS processes.
- Sirona follows NHS Agenda for Change pay and conditions to ensure that staff receive fair pay rates and contractual terms

- Sirona has a wellbeing strategy and initiatives to support our people's physical and mental wellbeing and lifestyle choice.

Training

- Undertake safeguarding training appropriate to their roles and responsibilities, which includes Modern Slavery & Human Trafficking, and which are refreshed as part of Sirona's mandatory training compliance framework.
- All staff receive a comprehensive induction programme which includes information on, and guidance regarding, slavery and human trafficking.
- Relevant staff are required to familiarise themselves with policies within their areas – i.e. HR

Working with Suppliers & Procurement

- Top 30 suppliers have been checked against the national modern slavery registry to provide assurance that they comply with the requirements of the regulation with any that are not registered written to requesting that this be evidenced. A further exercise to ensure all suppliers provide evidence of compliance has taken place and the Procurement Policy revised to provide additional rigor.
- We seek to procure goods and services through frameworks endorsed by the Cabinet Office and Department of Health and Social Care in accordance with the Public Contracts Regulations 2015. We use suppliers such as NHS Supply Chain and Crown Commercial Services for the majority of our purchases of equipment and utilities which adhere to the code of conduct on forced labour. 69% of our expenditure in 2022/23 was with NHS or government bodies.
- All members of the procurement team are required to undertake safeguarding training at a level appropriate to their roles and responsibilities.

Activities undertaken in 2022/2023

- Accountable Officer appointed to lead on the preparation of Modern Slavery & Human Trafficking Statements, namely Chief Finance Officer
- Identified policies due for review to and commenced a programme to revise them to reference to Modern Slavery and Human Trafficking.
- Instigated a process to ensure all new suppliers are asked about their compliance with the Modern Slavery & Human Trafficking Act 2015 as part of the revision of our Procurement Policy.
- Undertaken a total overhaul of our Whistleblowing/ Raising Concerns Policy, bringing together previous policies on Raising a Concern and Whistleblowing in Nov 2022
- Reviewed employee welfare arrangements, and introduced a new occupational health service provider in February 2023
- Expanded our internal Wellbeing Champions network and strengthened our Staff Network Groups.

Planned activities for 2023/2024

- Continue to review and revise policies we identify that need to include reference to Modern Slavery and Human Trafficking.
- Socialise the revised Procurement Policy with all staff and ensure that we adhere to the requirements stipulated within it.
- Share our action plans with procurement leads across the BNSSG Integrated Care system.
- Use our internal communications mechanisms to raise awareness of modern slavery among staff, including via our People Committee and established Staff Network Groups.
- Review policies and our website in line with requirements set out within the Modern Slavery & Human Trafficking Act 2015

We will continue to review our policies and procedures to ensure we can identify and address any issues associated with modern slavery and human trafficking. We are committed to identifying, preventing, and mitigating any potential or actual risks and will expect all of our staff, our partners, and our contractors to implement and enforce effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our organisation or in our supply chains.

We will expect all our Suppliers and Contractors to provide, upon request, evidence to demonstrate compliance with the law and reserve the right to terminate contracts where they are unable to do so within a reasonable timescale.

The Sirona Board believes that the organisation is following good practice in implementing steps to prevent modern slavery and human trafficking

Sue Porto
Chief Executive Officer
12th September 2023

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Sirona's slavery and human trafficking statement for the financial year ending 31st March 2023. It was approved by the Board on – 12th September 2023