

Modern Slavery and Human Trafficking Statement for reporting year 2023/2024 as required by the Modern Slavery and Human Trafficking Act 2015

Background

It has been noted that due to a change in legislation for NHS organisations, a blanket statement has been issued by NHS England covering all NHS bodies, although as a Community Interest Company (CIC) and Social Enterprise, despite delivering NHS services, we are still required to produce our own statement. The statement is required to be submitted to Companies House by 30 September 2024.

Key Points

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 2023/2024 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.

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.

Training and Policies in relation to slavery and human trafficking

- Human trafficking and modern slavery guidance is covered across all levels of Sirona's safeguarding mandatory training programme which all staff must complete. This programme includes a specific module related to identifying and raising concerns regarding suspected or disclosed concerns relating to Modern Slavery Assessment Tool (MSAT)
- 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 (NRM)).
- The referral process for adults/ children at risk and links to both Sirona Safeguarding Team covering both adult and child concerns is located on the safeguarding section of the Sirona website. Additionally, the website has links to external sources of guidance and support via links to the Safeguarding Boards and Partnerships across Bristol, North Somerset and South Gloucestershire (BNSSG) Local Authority areas.
- Sirona have a dedicated Safeguarding Team of experienced safeguarding experts that staff can access at any time during the working day to discuss concerns including issues related to suspected / disclosed Modern Slavery Assessment Tool (MSAT)
- The Safeguarding Team work collaboratively with multi-agency partners across health, Police and Social Care to share information appropriately and manage cases as they arise.

- 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.
- 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 on a daily basis. Cases of Modern Slavery Assessment Tool (MSAT) are managed via the agreed safeguarding and National Referral Mechanism (NRM) process. Collated data and outcomes are shared at the Quality and Outcomes Board Sub-Committee and Safeguarding Forum via quarterly and annual reports.
- 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 staff

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. Human Resources

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. 72% of our expenditure in 2023/24 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 2023/2024.

- Accountable Officer in place to lead on the preparation of Modern Slavery & Human Trafficking Statements, namely Chief Finance Officer
- Policies due for review were updated- Modern Slavery and Human Trafficking.
- Continued the 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.
- Undertaking thematic analysis on our Freedom to speak up reviews.
- Expanded our internal Wellbeing Champions network and strengthened our Staff Network Groups with a specific focus on Equality, Diversity and Inclusion
- Employee welfare arrangements have also been considered, with the introduction of a new occupational health service provider in February 2023 and the expansion of our internal Wellbeing Champions network and strengthening of our Staff Network Groups.

Planned activities for 2024/2025.

- Share our action plans with procurement leads across the Bristol, North Somerset and South Gloucestershire (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.

Julie Sharma
Interim Chief Executive Officer
Date: 11 September 2024