Modern Slavery Statement

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.

We are committed to ensuring that all of our employees are aware of the Modern Slavery Act 2015 and their safeguarding duty to protect and prevent any further harm and abuse when it is identified or suspected that the individual may be or is at risk of modern slavery/human trafficking.

We are committed to ensuring that no modern slavery or human trafficking takes place in any part of our business or our Supply chain. This statement sets out actions taken by ECCH to understand all potential modern slavery and human trafficking risks and to implement effective systems and controls. Section 54 of the Modern Slavery Act 2015 requires all organisations to set out the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

Organisational Structure

ECCH is a social enterprise with an annual turnover circa £35 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.

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.

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, ECCH builds long standing relationships with suppliers.

Relevant policies

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

Freedom to Speak Up Policy: Raising Concerns (Whistleblowing) Policy (which is aligned to ECCH's Safeguarding Policies). 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, email; whistleblowing@ecchcic.nhs.uk or complete our confidential disclosure form (Appendix 1, Whistleblowing / 'Speaking Up' Form; Reporting a dangerous or illegal activity or omission, which can be found on ECCH's website at https://www.ecch.org/media/ls3dmgoz/freedom-to-speak-up-whistleblowing-policy.pdf

- ECCH Values – ECCH's Values 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.

Due Diligence

ECCH undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation has a well-developed system of due diligence and reviews which includes:

- 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;
- Gaining assurance from all supply chain contracts from our suppliers that they have taken reasonable steps to prevent modern slavery and human trafficking;
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.

ECCH's Procurement Policy has been reviewed 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.

New standard templates now have anti–slavery clauses included.

Training

ECCH has a mandatory requirement for all staff to complete Safeguarding Adults specified within the Intercollegiate Document (RCPC 2015). All staff receive training in understanding, 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.

Furthermore, the organisation ensures appropriate recruitment matters training for ECCH staff so that they are better equipped to identify and prevent slavery and human trafficking.

Board of Directors' Approval

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

CEO signature



Ian Hutchison

Date: 6th September 2022