Modern Slavery Statement 2024/25

Bromley Healthcare aims to follow good practice and take all reasonable steps to prevent slavery and human trafficking. Our commitment to preventing slavery and human trafficking centres on our commitment to take steps that:

- Prevent slavery and human trafficking in our corporate activities and supply chains; and
- Ensure that all of our employees are aware of the Modern Slavery Act 2015 and their safeguarding duty to protect and prevent harm and abuse when it is identified or suspected that an individual may be or is at risk of modern slavery/human trafficking.

Our organisation

Bromley Healthcare was established on 1 April 2011 to provide out-of-hospital health and care services in Bromley. We now employ approximately 1,500 staff caring for people across Bromley and the surrounding boroughs of Bexley, Lewisham and Greenwich.

As a Community Interest Company, we are not an NHS organisation; however, the majority of the healthcare services we deliver are commissioned by South East London Integrated Care Board under the NHS Standard Contract and Local Authorities. We follow national NHS policies, standards and frameworks and have signed up to a number of agreements with other NHS organisations, including membership of the NHS London Procurement Partnership.

Working with Suppliers

Our procurement service is delivered under contract by Essentia, (part of Guy's and St Thomas' NHS Foundation Trust). The majority of our spend is via framework and supply contracts negotiated under the NHS Standard Terms and Conditions of Contract; these include a requirement for suppliers to have suitable anti-slavery and human trafficking policies and processes in place. The framework qualification process includes assurance questions regarding modern slavery, which are subsequently checked by the framework owner usually on an annual basis.

Our largest single supplier, NHS Supply Chain, has a Supplier Code of Conduct, which outlines main principles for suppliers in the area of labour standards and worker welfare

All suppliers are expected to adhere to these principles, which address issues such as child labour, forced labour, paying a living wage, working hours as well as health and safety. The Supplier Code of Conduct is a contractual requirement and has been part of all NHS Supply Chain Framework Agreements since 2009. The procurement service is committed to

ensuring that these issues are monitored and reviewed with Bromley Healthcare's supplier base.

The procurement service's senior team are Chartered Institute of Procurement and Supply (CIPS) qualified and uphold the CIPS's code of professional conduct and practice relating to procurement and supply. All members of the procurement team are required to undertake safeguarding training at a level appropriate to their roles and responsibilities.

In addition, template commercial agreements include an obligation that suppliers will comply with the Act and ensure that their suppliers and sub-contractors will also.

Our staff

Our commitment to preventing modern slavery and trafficking begins with our recruitment process. We adhere to the National NHS Employment Checks/Standards/Fit & Proper Person Guidance (this includes employees UK address, right to work in the UK and suitable references). Agency workers are engaged through recruitment agencies signed up to the London Procurement Partnership, which requires them to comply with the Modern Slavery Act.

Our Safeguarding policies include information about modern slavery and human trafficking, and clearly outline the role and responsibilities of all staff. We have an Associate Director of Safeguarding who provides strategic leadership to the Adult and Children's Safeguarding services. The safeguarding services support staff to identify and manage cases where there are concerns about modern day slavery

The Associate Director of Safeguarding chairs the Performance, Audit and Quality subgroup of the Bromley Safeguarding Adults Board. MDS is a priority for this group.

Safeguarding training is mandatory for all staff and includes information on trafficking and modern-day slavery in order to promote the knowledge and understanding of escalating concerns including making a National Referral Mechanism referral is appropriate. Clinical staff are also encouraged to undertake specific Modern Slavery Training provided by the local authority.

Staff are encouraged to raise any concerns that they might have and we have trained Freedom to Speak up Guardians available to all staff. We have a Freedom to Speak up Policy, which details how staff, sub-contractors and contractors can raise any concerns that they may have confidentially, if they are concerned about raising the matter via their line manager or head of service.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery Statement for the year 2024/25.

Jacqui Scott
Chief Executive

May 2025