

Modern Slavery Statement

Our commitment

Modern slavery can take place in a wide range of employment sectors, including health and social care. As a health provider we recognise our role in identifying and supporting victims of modern slavery and human trafficking who may come to us for care or treatment. This is part of our safeguarding strategy and arrangements.

We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or any part of our business activity. MCH's values of caring and compassion dovetail with the government's aim to eradicate modern slavery in the UK. As a provider of community healthcare, MCH has a duty to uphold the principles of the Human Rights Act (1998), specifically article 4 which holds that people have the right to live free from slavery or forced labour.

Modern slavery statement

In accordance with the Modern Slavery Act 2015, MCH makes the following statement regarding the steps it has taken 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.

MCH organisation and structure

Medway Community Healthcare (MCH) is a social enterprise Community Interest Company (CIC), providing high quality community health services to the people of Medway. Our responsibility for local people is key to the way that we operate our business and, as a social enterprise, we are able to ensure that this means we maximise our opportunities to invest our surplus into developing the services we provide and in supporting the health and wellbeing of our local community.

We are formed from the services directly provided by NHS Medway and have a strong history of partnership working with local GPs, Medway NHS Foundation Trust, Medway Council and other local stakeholders. We're a £61 million business with over 1,300 staff providing a wide range of both planned and unscheduled care in local settings such as healthy living centres, inpatient units and people's homes.

As an organisation that provides a range of high-quality clinical services across Medway, we compete for services with other providers from the NHS, independent and voluntary sectors. We use our knowledge and expertise to stay up to date on local new business opportunities, and are always horizon-scanning for new opportunities to grow our services. Our vision is to remain a successful, vibrant, community interest company that benefits the communities we serve.

Our commitment is to 'lead the way in excellent healthcare' and we are proud of our employees, who have the opportunity to become shareholders and influence business decisions, and have a significant role to play in delivering this commitment to the communities we serve.

MCH's policies relating to modern slavery

MCH is committed to ensuring there is no Modern Slavery or Human Trafficking in any part of our business and, in so far as possible, requiring our suppliers to hold corresponding ethos.

To identify and mitigate the risks of modern slavery and human trafficking in our own business MCH has established robust recruitment procedures as detailed in its Recruitment Policy. The policy supports compliance with national NHS employment checks and CQC standards.

In addition, other external agencies providing staff are approved within governance frameworks such as Crown Commercial Solutions, LLP, SBS etc.

MCH has a number of controls in place to ensure compliance with employment legislation:

- Our Speak Up Policy encourages staff to disclose issues and concerns that are within the public interest and our Freedom to Speak Up guardians are able to listen and talk to staff about any concerns;
- The Conflict of Interest Policy includes staff's personal responsibility to declare anything that may influence decisions, be that through the procurement or recruitment process. It references the Bribery Act 2010 with regard to indirect pressure to recruit or secure jobs and suppliers;
- Our adult and children's safeguarding teams play an integral part in ensuring that any current and potential risks are raised. Our patients and/or staff may show signs of abuse through modern slavery and we may be the first to notice these signs;
- The organisation and professional codes of conduct makes clear to employees the actions and behaviours expected of them when representing the organisation. The organisation's values are imbedded into our policies, procedures and that work that we do.

We also work with NHS partners such as NHS Protect to identify serious and complex economic crime, reduce the impact of crime and drive improvements in anti-crime work.

Safeguarding

All new starters are required to undertake safeguarding training at corporate induction which includes the escalation and reporting of safeguarding concerns including modern slavery. Our Safeguarding Adults' Policy also references national and local policy/legislation in regards to modern slavery.

MCH has guidelines for managing allegations against staff including safeguarding concerns encompassing modern slavery and works in partnership with statutory agencies to investigate any allegations of modern slavery made.

Working with suppliers

MCH will ensure our supplier base and associated supply chain, which provides goods and or services to MCH have taken the necessary steps to ensure modern slavery is not taking place.

The procurement team have committed to ensuring that this is monitored and reviewed



with its supplier base via a procurement strategy.

Due diligence

MCH undertakes due diligence when considering taking on new suppliers, and regularly reviews existing suppliers. We identify and mitigate the risks of modern slavery and human trafficking within our business and our supply chain we:

- Purchase a significant number of products through the NHS Supply Chain, whose Supplier code of conduct includes a provision around forced labour.
- Build long standing relationships with key supplies.
- Uphold professional codes of conduct and practice relating to procurement and supply.
- Seek assurance through the tendering process that our suppliers and business partners are able to evidence their approach to modern slavery.
- Audit and monitor agencies who provide staffing for us once a year to ensure they are able to provide evidence of qualifications and registration via the national frameworks.

In addition, MCH has a number of controls in place to ensure compliance with employment legislation. We propose to invoke sanctions against suppliers and staff who fail to improve their performance in line with an action plan including the termination of contracts.

Training

Currently we have not undertaken any specific training of our staff with regard to modern slavery and human trafficking however we have procedures and escalation routes in place to ensure it does not occur. Our procurement team are competent and qualified to Chartered Institute of Procurement and Supply standards and our clinical staff are trained to identify adult and children safeguarding risks and know how to escalate potential issues.

Awareness-raising

We will continue to raise awareness within our workforce and suppliers about modern slavery. We will also review whistleblowing and safeguarding concerns related to modern slavery.

Approval

This statement has been approved by MCH's directors who will review and update it annually.

Kim Reynolds

Director of Human Resources and Organisational Development

