

A close-up, high-angle photograph of a woman's face, looking upwards and to the right with a thoughtful expression. Her hand is resting under her chin. The lighting is soft and focused on her face, with the background being dark and out of focus.

# **Modern Slavery and Human Trafficking Statement**

## Modern Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Spectrum Community Health CIC (Spectrum) has taken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain during the year ending 31 March 2022.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Spectrum has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our Policies on Slavery and Human Trafficking

Spectrum is aware of our responsibilities towards patients, service users, employees and the local community and expects all our suppliers to adhere to the same ethical principles. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships.

We operate a number of internal policies and processes to ensure that we are conducting business in an ethical and transparent manner. These include:

**Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff and agencies on approved frameworks. These are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will.

**Equal Opportunities.** We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities

**Safeguarding policies.** We adhere to the principles inherent within all our safeguarding policies. These provide clear guidance so that our employees are aware of how to raise safeguarding concerns when required in relation to how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.

**Freedom to Speak Up.** We have established and embedded processes for Freedom to Speak Up, we have a Freedom to Speak Up policy, all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals. We also have a Freedom to Speak up Guardian within Spectrum

**Standards of business conduct.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our approach to procurement and our supply chain includes:

The application of NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract/Subcontract (for clinical procurement). Both require suppliers to comply with relevant legislation.

Spectrum staff must contact and work with the Procurement department when looking to work with new suppliers so appropriate checks can be undertaken.

Supplier adherence to our values. We are zero tolerant to slavery and human trafficking and thereby expect all our direct and indirect suppliers/contractors to follow suit.

### Training

Advice and training about modern slavery and human trafficking is available to staff through our mandatory safeguarding children and adults training programmes, our safeguarding policies and procedures, and our Safeguarding Team. It is also discussed at our compulsory staff induction training. The Safeguarding Team provide specific training into sites around the subject as well as additional resources and information for staff.

We are looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

### Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

To date Spectrum Community Health CIC have had no reports of modern slavery and human trafficking within our organisation nor our supply chains.

### Approval for this Statement



This statement was presented for approval at the Executive Team on 18/10/2023

Dr Linda Harris OBE, Chief Executive

Date: 18/10/2023

