



# SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Introduction

We are committed to improving our practices to combat slavery and human trafficking. We are fully aware of our responsibilities we have towards patients, service users, employees, and the local community. We have a robust set of ethical values that we use as guidance for our commercial activities. We also expect all suppliers to Community Health Partnerships (CHP) to adhere to the same ethical principles.

## Organisation Structure and Supply Chains

CHP provides high quality services to commissioners and local partners across England with the aim of delivering savings, increasing service integration, and driving optimal use of primary and community health estate.

CHP provides investment opportunities and access to private finance to the benefit of the NHS working with local commissioners, local partners, the Department of Health, the 49 Public Private Partnership LIFT Companies and the private sector.

CHP has an established investment function to manage the existing investment portfolio and to look at new investment opportunities, as part of this there are 49 LIFT companies that have delivered over 340 facilities.

CHP has a property portfolio of 307 integrated health and wellbeing centres, with over 1400 tenants, these include GP Practices, front line Local Authority services, pharmacies, libraries and a range of community and social care providers. As the Head Tenant we provide a professional management service to manage the estate.

## Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and, in so far as is possible, require our suppliers to hold a similar ethos.

Human Trafficking and Modern Slavery guidance is also embedded into CHP's People processes. The majority of our workforce are employed on a permanent or contract

basis and recruitment processes include direct advertising on our website and using reputable agencies. We adhere to employment checks and standards which includes right to work, suitable references, and controls concerning employee bank accounts. We are also committed to paying our people fairly and properly for the work they deliver with established pay review procedures.

We are committed to social and environmental responsibility and have zero tolerance for Modern Slavery and Human Trafficking. Our guidance on Modern Slavery is to:

- Comply with legislation and regulatory requirements.
- Employee code of conduct CHP makes clear to employees the actions and behaviour expected of them when representing the organisation. CHP strives to maintain the highest standards of employee code of conduct and ethical behaviour when operating and managing its supply chain.
- CHP uses only reputable employment agencies to source labour.
- Make suppliers and service providers aware that we promote the requirements of the legislation.
- Consider modern slavery factors when making procurement decisions.
- Develop awareness of modern slavery issues

**We will not award contracts where suppliers do not demonstrate their commitment to ensuring that slavery and human trafficking are not taking place in their own business or supply chains. We expect suppliers to implement due diligence procedures for their direct sub-contractors to ensure there is no slavery or human trafficking in their supply chains. Due Diligence and Reporting**

We ensure we undertake appropriate due diligence prior to awarding supplier contracts. We have adopted central government's Social Value Model, which requires a minimum 10% weighting on all procurements, including the elimination of Modern Slavery.

We encourage all our staff, clients, and other parties to report any concerns they may have in relation to any wrongdoing that affects others such as clients, staff, suppliers, or the public. Our Whistleblowing Policy and process allows for anonymous and confidential reporting, so anyone who has concerns about modern slavery issues at CHP or within our supply chain can raise them directly through our reporting routes.

No complaints or concerns were raised about modern slavery or human trafficking taking place in our business for the year ending 31<sup>st</sup> March 2022.



## Risk Assessment and Management

As an NHS organisation wholly owned by the Department of Health and Social Care, we consider that we are low risk for modern slavery and our most significant risks relate to our supply chain. We have a robust Risk Management Framework to identify and manage risks and implement appropriate measures to combat these.

## Training and Awareness

A company-wide mandatory training course relating to modern slavery is a requirement for all staff and is refreshed annually to ensure staff have up to date knowledge of the subject. Procurement and supplier training was implemented for all staff during the year, which supported awareness of modern slavery and highlighted our commitment to ethical supply chains.

## Effectiveness

We are committed to continuous improvement concerning modern slavery and human trafficking and will review and monitor throughout the next financial year. Where necessary, we will enhance our standards, policies, and procedures as well as improve training and communication about the Act.

### **We will:**

- Aim to include modern slavery conditions or criteria in specification and tender documents wherever possible,
- Evaluate specifications and tenders with appropriate weight given to modern slavery points,
- Encourage suppliers and contractors to take their own action and understand their obligations to the new requirements,
- Expect supply chain / framework providers to confirm compliance with their obligations in their processes.

### **Our Procurement staff will:**

- Undertake awareness training where appropriate.
- Aim to check and draft specifications to include a commitment from suppliers to support the requirements of the act.



## Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2023.

### Approval for this statement

Name (Director) Wendy Farrington-Chadd  
Signature



Date 02/08/2023

Name (Chair) Catherine Mason  
Signature



Date 02/03/2023

