

<b>Title:</b>	Modern Slavery Statement
<b>Version:</b>	V001
<b>Date Issued:</b>	July 2024
<b>Date for Review:</b>	July 2025

## MODERN SLAVERY STATEMENT

### Controlled Document

This is a controlled document. Whilst this document may be printed, the electronic version posted on the intranet is the controlled copy. Any printed copies of this document are not controlled.

As a controlled document this document should not be saved onto local or network drives but should always be accessed from the intranet.

### General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA 2018) compliance

Any personal information collected under this document will be compliant with GDPR and DPA 2018.

#### REVISION HISTORY

Version	Date	Description	Author(s)
V001	July 2024	New Document	Operations Support Manager

## INTRODUCTION

This statement sets out the steps that Health Now has taken to ensure that slavery and human trafficking is not taking place in any part of our organisation or supply chains.

Modern slavery and human trafficking are criminal offences under the Modern Slavery Act 2015. The Act includes the crimes of knowingly holding a person in a position of slavery, servitude, forced or compulsory labour and/or facilitating their travel with the intention of exploiting them.

Health Now has a zero-tolerance approach to any form of modern slavery. We are committed to behaving with honesty and integrity and acting fairly and ethically in all business relationships and dealings.

## ABOUT THE ORGANISATION

Health Now currently provides clinical insourcing solutions to NHS services, in a number of elective care treatment areas, to reduce waiting lists, improve patient access and provide real savings to the NHS.

Our CQC regulated Complex Care service provides complex care packages for people with a primary mental health need which are led by a nursing team, to enable service users to be cared for within the community, whether this is in their own homes, hospitals or local authority provided accommodation.

Health Now engages with individuals via an employed or on a contracted basis consisting of management/administrative staff and clinical staff engaged to work on our behalf across a range of NHS Trust sites, community diagnostic centres and elsewhere within the community.

## OUR POLICIES

Health Now is committed to being an ethical employer of staff and compliant with all relevant UK regulations and legislation. Health Now aims to ensure that staff working for the service are treated fairly and provided with appropriate terms and conditions which are compliant with UK laws.

Our aim is to ensure the services we provide are safe, high-quality and align with the Human Rights Act and Equality Act 2010.

The organisation will treat all individuals who come into contact with its services, including staff, positively and in line with their human rights.

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

1. **Recruitment policies** – We adhere to robust recruitment policies which includes procedures for the vetting of new employees in line with NHS Employment Check Standards, Safer Recruitment and best practice. Health Now aims to ensure that all staff have a right to work in the UK, and that they confirm their identities, past work history, skills and qualifications. Our recruitment processes are transparent, audited and reviewed regularly to ensure that they comply with safer recruitment standards and UK law.
2. **Safeguarding policies** – We take our responsibilities to safeguard the welfare of vulnerable adults and children very seriously. We aim to protect service users from harm through a range of activities, e.g. integrating our safeguarding policies and procedures with the local authority's, as well as implementing and monitoring our own policies and procedures to ensure they remain appropriate and up to date.
3. **Freedom to Speak Up (Whistleblowing) Policy** – Health Now encourages all our staff and managers, who have concerns about any aspect of our work, to come forward and speak up. We have set out a process for doing so, in line with the Public Interest Disclosure Act 1998, which reassures employees that they can make disclosures without fear of reprisal or victimisation.
4. **Employee's code of conduct** – Staff are required to follow the appropriate code of conduct for their profession or role, e.g. 'Code of Conduct for Healthcare Support Workers and Adult Social Care Workers in England', Skills for Care. Through policies and procedures and requiring staff to contractually comply with appropriate codes of conduct, the organisation makes clear to employees the actions and behaviours expected of them when providing care and representing the company. Health Now aims to maintain the highest standards of employee conduct and ethical behaviour. Line managers investigate any alleged breaches, and staff are required to make a declaration of outside interests where appropriate. This includes other paid employment.
5. **Complaints Policy** – this policy supports service users, patients, clients and other stakeholders to complain about our services. Complaints are used to learn from our actions and to develop plans to continuously improve our services. Health Now encourages the reporting of concerns/complaints which are fully investigated under our complaints policy, and outcomes fed back to the person raising the concern/complaint.

## **SUPPLIERS**

Health Now must ensure that an Approved Supplier Due Diligence Form is completed when looking to work with new suppliers, to ensure that the appropriate checks have been undertaken. This includes checks around slavery and other forms of trafficking.

We have a zero-tolerance approach to slavery and human-trafficking and thereby expect all our direct and indirect suppliers to adhere to this approach.

Where suppliers are found to be non-compliant or in breach of the Modern Slavery Act 2015, Health Now will cease trading with the company and find alternative suppliers to meet the supply gap.

## **TRAINING**

Health Now has a programme of mandatory induction and training that all staff and managers must complete appropriate to their role. All staff receive 'Safeguarding Adults' and 'Safeguarding Children', which includes relevant topics, e.g. PREVENT. Clinical staff are assessed for their competence in areas such as safeguarding through regular supervisions and spot checks/observations. Where staff are identified as requiring additional support and training, then this is provided and agreed/monitored through a personal development plan.

## **MONITORING KEY PERFORMANCE INDICATORS**

We will monitor the effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our organisation through:

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