

# Modern Slavery Act Transparency Statement

## Introduction to the Company

This statement is made pursuant to s.54 Modern Slavery Act 2015 and sets out the steps that City Hospitals Independent Commercial Enterprises Limited (Choice) has taken to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

Choice is a commercial business providing services to NHS organisations and its primary customer is South Tyneside and Sunderland NHS Foundation Trust. The company operates across three locations and is organised into three business units; outpatient pharmacy, estates and facilities management, and procurement.



## Our Policies

Choice is committed to ensuring that there is no modern slavery or human trafficking in any

part of our business activities or supply chain. As an organisation operating and providing services to public sector clients we recognise that we must act ethically and with integrity in our business relationships. Implementing, enforcing and reviewing our controls on slavery and human trafficking are an integral part of our ethical trading.

To ensure that Choice's commitment to prevent modern slavery and human trafficking in its operations and supply chain, the company has the following internal policies and procedures;

- **Recruitment** – robust screening checks are undertaken to ensure that all new employees are eligible to work in the United Kingdom and are not being forced to work against their will.
- **Whistleblowing** – the company has a Whistleblowing Policy which provides employees, suppliers, customers and others with the confidence to report any concerns regarding our business activities, including issues involving modern slavery and human trafficking.
- **Procurement** – When undertaking procurement of services and goods prospective we assess prospective supplier(s) to ensure:
  - (i) they comply with all relevant Law and Guidance and shall use Good Industry Practice to ensure that there is no slavery or human trafficking in its supply chains; and

- (ii) they shall notify Choice Senior Managers immediately if it becomes aware of any actual or suspected incidents of slavery or human trafficking in its supply chains.

The Choice Dignity at Work Policy sets out the company's commitment to promoting a safe, healthy and fair environment and a climate at work where there is dignity and respect for all staff, colleagues from other organisations and visitors. Bullying, intimidation and harassment are often present in situations involving slavery and human trafficking and the policy encourages staff to raise concerns so they can be investigated. The policy also establishes Dignity at Work Advisors who can provide a confidential advisory service to staff and signpost to appropriate support resources. The policy also recognises the key role trade unions play in supporting staff with concerns.

The company's Employment Checks Policy establishes the identity and requires other checks on new employees as well as agency workers. It is common for those involved in modern slavery and human trafficking to retain identity documents in order to exert control over victims. The company's policy requires identity documents to be provided by the employee in person and production by a third party is not accepted.

The Whistleblowing Policy recognises the importance of dealing with concerns from staff and others. The policy provides a clear procedure for raising concerns including issues such as modern-day slavery. The company also provide a confidential counselling telephone service for staff. The Choice Employee Assistance Programme,

provided by Carefirst, provides a telephone support service on a wide range of issues including support for victims of slavery and human trafficking.

In relation to temporary workers and agency staff Choice uses a vetted preferred supplier list to source temporary workers.



## Due Diligence

Choice has an internal risk management process to ensure that risks are identified and mitigated with appropriate controls implemented. As part of our risk management process we have systems in place to identify and assess potential risk areas for modern slavery and human trafficking both within our business and in our supply chain. Concerns raised through our Whistleblowing policy are investigated and those raising concerns are protected.

## Supplier Compliance

Choice recognises the importance of influencing ethical business practices through

its supply chain and, in this regard, shall seek compliance with its high ethical standards from all of its suppliers in respect of modern slavery and human trafficking. Potential suppliers shall be assessed as part of any procurement exercise as well as during contract performance reviews. Where appropriate contract clauses shall be used to facilitate compliance. Compliance shall involve senior managers and directors with support from Human Resources, Procurement and legal staff where required.

The Procurement team makes use of the national NHS Supply Chain's Modern Slavery Assessment Programme. In addition NHS Supply Chain has developed an online Modern Slavery Assessment Tool for use by suppliers. The tool is a risk identification and management tool that will help providers, in partnership with suppliers, reduce the risk of exploitation of workers in supply chains and help drive improvements. Supply.



Peter Sutton  
Managing Director

During procurement exercises, putative suppliers are asked to confirm conformance to the MSA act as part of the tender documentation. In 2022 we will look to increase scrutiny of the conformance of new and current suppliers.

## Training

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking.

Training on slavery and human trafficking training is delivered as part of Safeguarding Training (all levels) which all members of staff are required to undertake.

Our Procurement staff involved in tendering, contracting and buying activities will receive bespoke training on the contents, and requirements of the Modern Slavery Act 2015.

## Approval of this Statement

This statement has been approved by the Board of Directors in March 2025.



Mark Stouph  
Chair of the Board