

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.

New Developments

CHoICE has introduced a Dignity at Work Policy in October 2019. The 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 was reviewed in the last 12 months and establishes the identity and other checks conducted for 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.

In December 2019, CHoICE reviewed its Whistleblowing Policy. The 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 provides 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.



The company has also introduced a Recruitment Policy which requires all posts to be advertised on the national NHS website. The advertisement of posts on the official NHS website ensures that they are widely accessible so that candidates are less likely to use disreputable agencies which may seek payment from candidates for work opportunities. In addition, CHoICE uses a 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 company's Procurement team make use of the national NHS Supply Chain which launched a Modern Slavery Assessment Programme in January 2020. The initiative compliments the government's priority to tackle modern slavery. Four of the category towers are currently being assessed using the CIPS Ethical Procurement Module published in 2019. The remaining category towers are due to commence shortly. Risk-mapping is becoming a key activity in NHS Supply. Some suppliers with a turnover



Ian Makinson
Managing Director

above £36m are already reporting under the UK Modern Slavery Act and are seen as key partners to work with to obtain a greater understanding of supply chains. The aim of this initiative is to ensure there is more transparency required of suppliers and their supply chains, provide greater levels of due diligence and add integrity to the NHS Supply Chain contract.

NHS Supply Chain has developed a Modern Slavery Assessment Tool and suppliers will be invited to participate using the online tool. The tool itself is a risk identification and management tool that will help category tower service providers (CTSPs) work in partnership with suppliers to reduce the risk of exploitation of workers in supply chains and help drive improvements and remediation.

Training

CHOICE reviews training requirements for employees annually to identify training needs and ensure a high standard of competence for all of its staff. The need for awareness and other training for staff in respect of modern slavery and human trafficking will form a part of the annual training review.

Approval of this Statement

This statement has been approved by the Board of Directors in March 2020.



Mark Stouph
Chair of the Board