

Modern Slavery Act – Annual Statement 2019/20

Introduction

This statement sets out Locala Community Partnership's commitment to preventing slavery and human trafficking in all its corporate activities and within its supply chains. Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude.

It outlines the steps we have taken during the financial year 2019/20 to ensure compliance with the Modern Slavery Act 2015 (MSA) and reduce the risks of slavery or human trafficking in our organisation and supply chains. It covers the activities of Locala Community Partnerships CIC and its subsidiary Locala Homecare Ltd.

Locala Community Partnerships ('Locala')

Locala Community Partnerships was formed in 2011 as a Community Interest Company (CIC) and an independent, not for profit social enterprise. We provide NHS and Local Authority commissioned community services to over 400,000 people in Kirklees, Calderdale and Bradford. We employ around 1300 people who are all committed to delivering the highest quality of care.

Community health care covers a range of services from health visitors to speech and language therapists, district nursing as well as dental care, school nurses, foot care, sexual health and physiotherapy. Our services are offered in a number of locations including health centres, surgeries, schools/colleges and community settings as well as in the home.

We also work closely with local GPs, other local NHS organisations, the Local Authority and third sector organisations to deliver a coordinated approach to care and support. As a not-for-profit business, any financial surplus is re-invested back into supporting patient care and increasing our social impact in the communities we serve.

In 2013 Locala Community Partnerships CIC set up a subsidiary business; Locala Homecare Ltd to provide domiciliary care. The home care business is closely linked to the provision of community health care, with the aim of providing high quality care and by doing so improving the quality of life, and support for independent living in the local community.

Our supply chains/working with suppliers

Locala is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking across its business and supply chain.

The delivery of quality health care relies on developing successful partnerships with other organisations to provide goods and services at the best possible value for money. Our Procurement processes are designed to ensure we operate in a legal, ethical and inclusive manner whilst achieving best value for money. This includes enabling our procurement activity to generate social value, as well as commercial, benefits.

We expect our suppliers to have internal policies relating to and have processes in place to meet the Modern Slavery Act 2015. 'Any supplier identified as not adhering to these **will** have their contract terminated unless steps are taken to remedy the situation within a stated timescale'.

Locala purchases a significant number of products through NHS Supply Chain, who's 'Supplier Code of Conduct' includes a provision around forced labour. During 2019/20 the impact of the Covid-19 pandemic on the availability of PPE led to restrictions on procurement other than through the NHS Supply Chain.

We also have, however, a broad range of other suppliers. Locala colleagues are expected to work with the Procurement team when looking to work with new suppliers of goods and services so that appropriate checks can be undertaken. Risk areas commonly deemed to be most at risk in relation to Modern Slavery within our sector are providers of agency staff and facilities management contractors.

We use only specified, reputable employment agencies to source labour and verify the practices of any new agency before accepting workers from that agency.

Locala Policies and procedures

Locala's policies, procedures, governance and legal arrangements are robust, ensuring that proper checks and due diligence are applied to ensure compliance with legislation including the Human Rights Act 1998, Equalities Act 2010 and the Modern Slavery Act 2015.

Recruitment and Selection Policy

Locala's Recruitment and Selection Policy sets out the standards that must be adhered to by the organisation and ensures comprehensive checks and balances are in place to reduce as far as possible the likelihood of individuals being employed who have been trafficked or are the victims of modern slavery.

We also conform to the NHS employment check standards within our workforce recruitment and selection practices, including through our managed service provider contract arrangements.

Equality Diversity and Inclusion Policy

Locala is committed to ensuring equality of access to employment and training opportunities. Our Equality, Diversity and Inclusion policy aims to eliminate unlawful and unfair discrimination and ensure that all groups and individuals within the community benefit through having equal access to employment opportunities provided.

Safeguarding

The Locala CIC Safeguarding Policies includes reference to modern slavery as a type or pattern of behaviour which constitutes abuse of a person at risk; they also require all Locala employees to complete training on Safeguarding adults and children.

Our Safeguarding mandatory training includes role relevant awareness and understanding of modern slavery and helps colleagues identify, respond to and support victims of modern

slavery. Knowledge around Modern slavery and Human trafficking is required at all levels across the organisation and there are resources on ELSIE (Staff Intranet), e-learning packages and other learning opportunities available to suit different learning styles.

Whistleblowing (Freedom To Speak Up) Policy

Locala encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Freedom to Speak Up procedure, together with other policies such as the Grievance policy and procedure, are designed to make it easy for colleagues to make disclosures or raise concerns regarding poor working practices, without fear of victimisation or retaliation. Employees, people we support and their families or others who have concerns are encouraged to speak up and procedures are in place to support this to happen in a confidential manner.

Training and Promotion

Our Safeguarding training includes role relevant modern slavery awareness and understanding. We also provide information and guidance on the Modern Slavery Act which is available to all staff through Locala's Intranet (ELSIE).

Looking Ahead

Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers. All future tenders will extend the adherence to the Modern Slavery Act 2015 from relevant organisations to all organisations submitting a bid.

We will continue to provide appropriate training or briefing materials to relevant colleagues and volunteers. There is an intention to provide a series of video briefings on a range of Safeguarding topics, including Modern Slavery, for colleagues to access.

Approval

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 2020.

It has been formally approved by the Board of Locala Community Partnerships CIC and signed on their behalf. They have approved this statement for publication on the Locala website.



Chief Executive
October 2020