

Modern Slavery Act – Annual Statement 2023/24

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 is a serious and often hidden crime in which people and children are exploited for criminal gain. The impact can be devastating for the victims. Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude.

It outlines the steps we have taken during the financial year 2023/24 to ensure compliance with the Modern Slavery Act 2015 (MSA) and minimise any associated risks. It covers the activities of Locala Community Partnerships CIC.

What is Modern Slavery

Modern slavery is a complex crime that takes a number of different forms. It encompasses slavery, servitude, forced and compulsory labour and Human Trafficking. This is illegal and therefore a criminal offence under the Modern Slavery Act 2015 and needs to be reported.

Trafficking is characterised by the recruitment and movement of the child or young person by threat or deception for the purpose of exploitation which may include sexual/ criminal exploitation, forced labour, domestic servitude and removal of organs.

About 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 a range of NHS and Local Authority commissioned community services to people in Kirklees, Calderdale, Bradford, Stockport, Tameside, Wigan and Leigh. We employ around 1500 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, local NHS organisations, Local Authorities, Third sector organisations, and Integrated Care Boards (ICB) 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.

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.

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. Our Procurement colleagues have the necessary qualifications to ensure a high standard of practice in the procurement of goods and services.

We expect our suppliers to have internal policies and 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. Where other suppliers are used, Locala colleagues are expected to work with the Procurement team when looking to work with any new suppliers of goods and services so that appropriate checks can be undertaken.

Areas that are 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 always verify the practices of any new agency before accepting workers from that agency. The revised procedures relating to use of Bank and Agency workers have been implemented and now have clearer expectations on pre-employment checks being carried out.

Locala Policies and Procedures

All colleagues have a personal responsibility for the successful prevention of Slavery and Human Trafficking.

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.

These policies provide guidance and advice to colleagues in assessing and managing risks in relation to modern slavery and human trafficking and additionally gives a platform for colleagues to raise concerns about poor working practices.

Key policies and procedures include:

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 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 Policy

Locala's commitment to contribute to the eradication of modern slavery is reflected in the Safeguarding Adults and Safeguarding Children policies. These Policies include modern slavery as a type or pattern of form of abuse which can relate to an adult or child at risk, they also require all Locala employees to complete training on Safeguarding adults and children. Both Policies were reviewed during 2023.

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. 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 and without fear of reprisal.

Locala's Freedom to Speak up Policy offers guidance to colleagues on raising concerns confidentially and our Freedom to Speak up Guardians and Advocates are available to provide support and signposting for colleagues. This Policy was refreshed and approved by the Locala Board in April 2024.

Training and Promotion

Locala has a robust safeguarding training plan and requires all Locala employees to complete safeguarding training which is in adherence to roles and responsibilities set out in the Royal College of Nursing intercollegiate guidance 2018/19. Safeguarding training compliance is monitored by the Safeguarding team, and this is reported within Locala's governance structure.

The Safeguarding Team have provided information and guidance on the Modern Slavery Act and how to respond to concerns about modern slavery. This is available to all colleagues through Locala's Intranet (ELSIE) and is regularly updated by the Safeguarding team.

In addition, monthly briefing sessions are delivered by the Locala Safeguarding team on a range of topics, modern slavery being included. The briefings are recorded and are available to all colleagues through the intranet. The 30-minute briefings have been successful due to the flexible approach to learning.

Managing Risk

As detailed above Locala has in place a robust system for the assessment and monitoring of our supply chain with regard to compliance to the Modern Slavery Act.

Internally Locala also has a number of measures to safeguard the organisation against slavery and human trafficking:

- All colleagues employed by Locala have an employment contract that is compliant with UK Law.
- All colleagues undertake mandatory Safeguarding Training, which includes the key elements of the Modern Slavery Act.
- All colleagues have the ability to raise any concerns through the Locala Freedom to Speak-up Guardian.

With the controls in place as described, the Locala Board considers the risk of Modern Slavery and Human Trafficking within our supply chain and employment of staff to be low. To date Locala has had no reports of modern slavery and human trafficking within our organisation or in our supply chains.

Looking Ahead

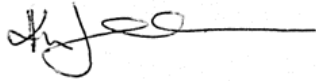
Over the course of the next financial year, we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers. In particular we will continue to:

- a) Consider how best to raise awareness of these matters to people we provide services to, including awareness of support available. A particular focus will be given to new geographical areas or new services to ensure the level of awareness and support available is consistent across the whole of Locala.
- b) Provide appropriate training or briefing materials to relevant colleagues and safeguarding training compliance will continue to be monitored with support offered to any areas of need.
- c) Report within our governance structure on actions being taken to address issues relating to Modern Slavery and Human trafficking.

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 2024.

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.



Karen Jackson, Chief Executive

August 2024

References:

Royal College of Nursing (2019) Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff