

## Modern slavery and human trafficking statement 2018/19

### 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 2018/19 to ensure compliance with the Modern Slavery Act 2015 (MSA) and minimise the risks of to ensure that there is no 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.

### Our Organisation

Locala Community Partnerships provides NHS community services to over 400,000 people in Kirklees and beyond. We are a Community Interest Company (CIC) an independent, not for profit social enterprise. We employ 1400 people who are all committed to delivering the very best services to patients. Community health care covers a wide range of services from health visitors to speech and language therapists, stop smoking support to district nursing as well as dental care, school nurses, foot care and physiotherapy. Our services are offered in health centres, surgeries, Holme Valley Memorial Hospital as well as in the home. We also work closely with local GPs, Social Services, other local NHS organisations and the Local Authority to deliver a co-ordinated approach to care and support. As we are a not-for-profit business, any financial surplus is re-invested back into supporting patient care.

### Our supply chains

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. This can be anything from the supply of pens and paper, to syringes and dressings, to waste disposal or laboratory testing.

It is generally more efficient for us to purchase most of our everyday items such as consumable office and clinical products through NHS Supply Chain. We have however a broad range of suppliers and, having reviewed our business, those which we deem to be most at risk from Modern Slavery are providers of agency staff, building, maintenance and cleaning contractors, and IT equipment providers.

## **Policies and Procedures**

Our policies and procedures reflect our commitment to acting ethically in all our business relationships and to implementing effective systems and controls to ensure slavery and human trafficking is not taking place.

### **Recruitment and Selection**

We have very robust recruitment processes which adhere to safe recruitment principles. This includes relevant requirements in terms of checking of eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will and carrying out of necessary checks such as DBS (Disclosure and Barring Service) checks

### **Procurement**

Our Procurement procedures 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 and environmental, 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 or that they would sign up to the Locala's policies.

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.

### **Safeguarding**

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

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 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 whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of 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.

## 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 2019.

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



Chair

28 February 2019



Chief Executive