



MODERN DAY SLAVERY STATEMENT



Introduction:

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Amvale has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain in the course of our services delivery.

The Modern Slavery Act 2015 builds on the Modern Slavery Strategy published by the Coalition Government in 2014. Like the Serious and Organised Crime Strategy, it is based around the 4Ps framework of pursue, prevent, protect and prepare.

➤ **Pursue:**

Prosecute and disrupt individuals and groups responsible for modern slavery.

➤ **Prevent:**

Prevent people from engaging in modern slavery.

➤ **Protect:**

Strengthen safeguards against modern slavery by protecting vulnerable people from exploitation.

➤ **Prepare:**

Reduce the harm caused by modern slavery through improved victim identification and enforcement support.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Amvale has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Policy on Slavery & Human Trafficking:

Amvale is aware of our responsibilities towards our clients, service users, employees and the local community and expect all of our own suppliers to adhere to the same ethical principles. We are committed to ensuring that there is no modern slavery or human trafficking in our

supply chains or in any part of our business. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include:

➤ Recruitment Policy:

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, and approved agencies, to provide assurance that pre-employment clearance has been obtained for any staff, to safeguard against human trafficking or individuals being forced to work against their will.

➤ Equal Opportunities:

We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities

➤ Safeguarding policies:

We adhere to the principles inherent within both our safeguarding children and adult's policies. These are compliant with the local and Commissioning Trust's multiagency agreements and provide clear guidance so that our employees are clear on how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.

➤ Whistleblowing Policy:

We operate a Whistleblowing Policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.

➤ Standards of business conduct:

This is detailed within are Staff Handbook, company Policies and Procedures and explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our approach to procurement and our supply chain includes:

Ensuring that our suppliers are carefully selected through our robust supplier selection criteria/processes.

Requiring that any contractor to us provides details of its sub-contractor(s) to enable the company to check their credentials.

Randomly request that any of our own contractor's provide details of their supply chain.

Ensuring any company agreements with contractor's contain information on human rights issues and how they must comply and report any non-compliance issues.

Ensuring any company agreements with contractor's contain clauses giving the company the right to terminate a contract for failure to comply with labour laws.

Circulation of this document.

Company staff must contact and work with the General Manager when looking to work with new suppliers so appropriate checks can be undertaken.

Supplier adherence to our values. We are zero tolerant to slavery and human trafficking and thereby expect all our direct and indirect suppliers/contractors to follow suit.

Training:

Advice and training about modern slavery and human trafficking is available to staff through our mandatory safeguarding children and adults training programmes, our safeguarding policies and procedures, and our *Safeguarding and *Clinical Lead. It is also discussed at our compulsory staff induction training.

We are looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

Practical Step's:

➤ Understand the issues and challenges and how they relate to the business:

Modern slavery takes different forms, and it shouldn't be assumed that it will be obvious to the casual observer. It can range from commonly highlighted abuses such as forced labour, human trafficking and sexual exploitation to less well-recognised forms such as withholding of passports, debt bondage and excessive charges around housing. Although time, resource, and expertise may be a common challenge for many organisations, Amvale have an appointed person through their Clinical Lead and subject matter experts through their specialist HR advisors to understand what the issues are, both explicit and covert, and the implications for due diligence processes.

➤ Mapping risk areas along the supply chain:

Risks can be anywhere around the business functions, and complexity is not an excuse for inaction in the court of public opinion. Therefore, we understand what our supply chain looks like, the levels of supplier relationships associated with the business, and consider where vulnerabilities may exist, informed by internal expertise as well as external news, research and risk-analysis tools and reviews to provide some direction as to where effort and resources should be directed to mitigate risks.

➤ Building on what we already have:

Amvale already have policies, systems and measures in place to monitor recruitment, procurement and other business relationships. We review existing processes and expand them as appropriate to reflect insights gained from the previous two steps. The rigour of the company's due diligence process is commensurate to the levels of risk across the business.

➤ Company Board Responsibility:

Modern slavery and human rights risks are recognised at Board level who actively commission and support this document. Modern slavery risks are considered as a part of business strategy discussions, and it sends a message to the rest of the business about the importance of the issue.

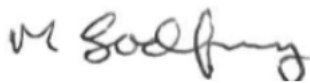
➤ Education & Raising Awareness:

Education is critical to raising awareness and vigilance – both with staff and suppliers. This is achieved through training modules within staff Safeguarding mandatory training and Induction. We adopt a discreet "Open Door" policy between management and staff in an effort to ensure that appropriate feedback and reporting mechanisms are in place so that any potential breaches can be escalated through the right channels and addressed in a timely manner.

Our Performance Indicators:

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.



M J Godfrey
Chief Executive Officer