



MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

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1. INTRODUCTION

At Integrated Care Support Services, we are committed to acting ethically and responsibly in all aspects of our business operations, and we take a zero-tolerance approach to modern slavery and human trafficking. We recognise the devastating impact that modern slavery and human trafficking can have on individuals, communities, and society at large, and we are committed to ensuring that our business and supply chains are free from these practices.

As part of our commitment to eradicating modern slavery and human trafficking, we have developed this policy to outline our approach to identifying and mitigating the risks of modern slavery and human trafficking in our business and supply chains. This policy applies to all employees, contractors, and suppliers of Integrated Care Support Services, and we expect all parties to support our efforts in combating modern slavery and human trafficking.

2. RISK ASSESSMENT AND DUE DILIGENCE

Our organisation is committed to complying with all relevant legislation regarding modern slavery, including the Modern Slavery Act 2015. We provide training to our employees and suppliers on identifying and reporting concerns related to modern slavery. We also communicate our expectations and commitment to ethical practices to our suppliers. We monitor our supply chain to ensure compliance with our policies and identify any areas for improvement. By implementing these measures, we aim to ensure that our supply chain is free from modern slavery and that we are conducting our business in an ethical and responsible manner.

We do not consider that we operate in a high-risk environment because the majority of our supply chain operates within the UK and comprises low-risk industries, such as internet software and services. We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

3. TRAINING

To promote a thorough understanding of the risks of modern slavery and human trafficking in our business and supply chains, we offer mandatory training to our staff. The training programme is delivered through the E-Learning for Health (E-Lfh) platform, and it covers several essential topics. These include:

- Level 1 Equality, Diversity, and Human Rights, which helps our employees to understand the importance of promoting fairness, dignity, and respect in all aspects of our business operations.
- Level 1 Health, Safety, and Welfare, which ensures that our employees are aware of their responsibilities in maintaining safe and healthy working conditions for all workers.
- Prevent duty training: supporting people vulnerable to radicalisation (gov.uk).

Through this mandatory training program, we ensure that our staff are well equipped to identify and address any potential risks of modern slavery and human trafficking in our business and supply chains. We also encourage our employees to report any concerns they may have so that we can take appropriate action to mitigate the risks.

4. REPORTING PROCEDURES

If an employee or worker has any concerns or suspicions of potential modern slavery or human trafficking within our business or supply chains, they must report them immediately to their line manager, supervisor, or designated person. This reporting procedure is crucial to our efforts to eradicate modern slavery and human trafficking in our operations and supply chains.

Once we receive a report, we will promptly and thoroughly investigate it. We will work with our suppliers and other relevant parties to take appropriate action to mitigate any potential risks. Our priority is to ensure that the individuals involved are protected from any further harm.

If a potential breach is identified, we will report it to the relevant authorities, such as the Modern Slavery Helpline or the police, as required by law. We will also take steps to prevent similar incidents from happening in the future.

Confidentiality and anonymity are of utmost importance to us. We will protect the identity of the employee or worker who reports the concerns, and we will not tolerate any retaliation or victimisation against anyone who reports any concerns in good faith. We encourage all employees and workers to report any concerns they may have and assure them of our full support and protection.

5. RECORD KEEPING

In order to conduct thorough investigations and effectively monitor instances of abuse, it is crucial to maintain detailed records of all procedures involved in raising, reporting, and investigating any concerns, regardless of whether the concerns are substantiated or not.

6. CONTACT US

Questions, comments and requests regarding this modern slavery and human trafficking policy are welcomed and should be addressed to Integrated Care Support Services inbox at swlicb.training@nhs.net.