

Introduction

Our Modern Slavery policy outlines The Standing CT Company's (SCT) approach to ensuring that modern slavery or human trafficking is not taking place within our business or supply chain.

We have a zero-tolerance approach to any form of modern slavery (slavery, servitude, human trafficking and forced labour).

Aims and Objectives

This policy is made in line with section 54 of the Modern Slavery Act 2015 and sets out the steps SCT is taking to make sure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. SCT is 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.

Responsibilities

SCT is aware of its responsibilities towards patients, service users, employees and the local community and expects suppliers to SCT 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.

Procedure

All suppliers sign up to our terms and conditions of contract which contain a provision around Good Industry Practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains, and that they conduct their business in a manner that is consistent with SCT's anti-slavery policy.

Policies

SCT have a number of internal policies in place to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Recruitment Policy**

SCT operate a robust recruitment policy including conducting eligibility to work in the UK checks for all permanent and bank staff. Any agencies providing temporary staff must provide assurance that pre-employment clearance has been obtained for such staff to safeguard against human trafficking or individuals being forced to work against their will.

- **Equal Opportunities Policy**

SCT 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 (Living Wage as a minimum), fair terms and conditions of employment and access to training and development opportunities.

- **Safeguarding Policies**

SCT adhere to the principles within our safeguarding of adults and children policies. These provide clear guidance so that 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**

SCT 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 reprisal.

Conducts and Standards Policy

This code explains the manner in which we behave as an organisation and how we expect our employees to act.

Procurement and Supply Chain

SCT's approach to procurement and their supply chain includes:

- Ensuring that our suppliers are carefully selected through a robust supplier selection criteria/process
- Requiring that if a contractor uses sub-contractors SCT receives details to check their credentials
- Requesting that any contractors provide details of their supply chain
- Ensuring that any invitation to tender documents contain clauses on human rights issues
- Ensuring that all contractors have anti-slavery policies in place
- Ensuring that contracts also contain clauses giving SCT the right to terminate a contract for failure to comply with labour laws

Training

Training advice and training about modern slavery and human trafficking is available to staff through our mandatory safeguarding children and adults training courses, our safeguarding policies and procedures and our safeguarding lead.

We are looking at ways to continuously increase awareness within SCT 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.

Performance Indicators

SCT monitors the effectiveness of the steps taken to ensure that slavery and or human trafficking is not taking place within our business or supply chains by monitoring that no reports are received from staff, the public or other agencies to indicate that modern slavery practices have been identified.

Last Review Date: Dec 2023

Next Review Date: Dec 2025