



MODERN SLAVERY (SLAVERY, HUMAN TRAFFICKING AND CHILD LABOUR) POLICY

▲ POLICIES REPRESENT THE RULES AND DEFINITIONS ▲

DOCUMENT CONTROL

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DOCUMENT OWNER	Danielle Sargeson Group Head of HR
GOVERNANCE GROUP	CQGB

VERSION CONTROL

NO.	DATE	DESCRIPTION OF CHANGE
1.0	01-09-2019	New policy
1.1	01-09-2021	Minor update to include new date in text
1.2	29-12-2023	Minor update



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1. WHY IS THIS POLICY NEEDED

1.1 PURPOSE

Mountain Healthcare operates in a highly regulated industry and given the nature of our business, we believe there is a low risk of Slavery, Human Trafficking or Child Labour having a connection with services. However, we ensure we monitor this risk by keeping our supply chain and working practices under review.

1.2 REGULATION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Mountain Healthcare's (MH) slavery and human trafficking statement.

1.3 DEFINITIONS AND ABBREVIATIONS

ITEM	MEANING
MH	Refers to Mountain Healthcare (the company)
THE PEAK	Mountain Healthcare's Intranet
CLINICAL QUALITY GOVERNANCE BOARD (CQGB)	The CQGB provides assurance to the Board on service quality and the application of controls assurance in relation to clinical services. It scrutinises the systems in place for effective care co-ordination and evidence-based practice and focuses on quality improvement to ensure a co-ordinated holistic approach to clinical risk management and clinical governance is in place, protecting standards of clinical and professional practice.

1.4 RESPONSIBILITIES

ROLE	RESPONSIBILITY FOR
ALL STAFF	Complying with this policy
LINE MANAGERS	To ensure that this policy is understood and followed in their area
HR DEPARTMENT	To ensure that Safer Recruitment Training is provided to all staff who carry out recruitment for Mountain Healthcare
FINANCE DEPARTMENT	To ensure that all appropriate checks are carried out on Mountain Healthcare's suppliers



2. SLAVERY, HUMAN TRAFFICKING AND CHILD LABOUR

2.1 TYPES OF MODERN SLAVERY

Modern slavery takes many different forms in the UK and will vary from region to region and change over time however there are four broad categories.

- Labour Exploitation
- Domestic Servitude
- Sexual Exploitation
- Criminal Exploitation

Where individuals agree to be brought to the UK illegally, but there is no intention to exploit or take advantage of them once they arrive, this is known as smuggling and is an immigration offence rather than modern slavery or human trafficking.

Victims of modern slavery can be found anywhere and there are certain industries where this is more prevalent such as agriculture, fishing, building sites and the sex industry. Fortunately, Mountain Healthcare is not one of those industries although some parts of the services that Mountain provides is to the sex industry and so it is important that as a company everyone is aware of modern slavery, human trafficking, and child labour. Where any member of staff has concerns for a client/patient, they should follow the safeguarding procedures.

To ensure that we do all we can during our recruitment, we ensure that all those carrying out recruitment complete the Safer Recruitment Training which provides details on the necessary checks that are place at the recruitment stage.

2.2 DUE DILIGENCE PROCESS FOR SLAVERY, HUMAN TRAFFICKING AND CHILD LABOUR WITH OUR SUPPLIERS

We maintain a governance and risk management framework with ongoing review of risk throughout the year. This process covers all our business areas and is reportable at Board Level. Although it is considered that MH has a low direct risk of Slavery. Human Trafficking or Child Labour, we have applied a risk and assurance-based approach to mitigate residual risks. This approach assists us to identify any suppliers, where it is considered that additional assurance is required, that they comply with our ethical approach to supply chain management. Typically, this includes pharmaceutical suppliers with multinational operations, in locations where the inherent risk is potentially higher. We continue to work with these key suppliers, as part of our supply chain due diligence, to confirm their understanding of this legislation and where relevant, compliance initiatives.

MH has been able to confirm significant awareness of this legislation with our supply chain partners. These suppliers are also subject to national, regional, and global governance obligations, which help to define how they operate. Our objective is to have long lasting productive relationships and only source from suppliers that satisfy MH's ethical standards.

All our new suppliers are subject to due diligence, and we regularly review our supply chain partners to provide a robust assurance that compliance is maintained. This includes a rigorous selection process, due diligence appraisal activities and targeted interventions for assurance purposes, as part of our vendor and supplier controls. Our agreements with suppliers include requirements for third party providers to obey national and regional statutory requirements in the country in which they operate. We will only work with suppliers who commit to a zero-tolerance approach to slavery, human trafficking, and child Labour.



Where we find that a supplier does not comply with the high ethical standards set by Mountain, we commit to fully co-operating with our supplier and where necessary, with all the relevant agencies to address compliance.

We will continue to enhance our procedures to help us identify, prevent, and mitigate any risks of modern slavery, human trafficking, and child labour in relation to new and existing suppliers.

3. HOW THIS POLICY WILL BE IMPLEMENTED

- This policy will be published on The Peak

4. HOW THE IMPLEMENTATION OF THIS POLICY WILL BE MONITORED

AUDITABLE STANDARD / KPI		FREQUENCY / METHOD/ ACCOUNTABLE	GOVERNANCE OVERSIGHT
1	Review of any incidents reported by the Safeguarding process	Annually	CQGB

5. SUPPORTING DOCUMENTATION

- Safer Recruitment Training
- Safeguarding Policy

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EQUALITY IMPACT ASSESSMENT

DATE OF ASSESSMENT:	29 th December 2023	
COMPLETED BY:	Danielle Sargeson, Group Head of HR	
WHO IS INTENDED TO BENEFIT FROM THE POLICY?	Staff: Ensure that all staff are aware of the policy and how to raise/report any concerns that they have for clients of with Mountain's suppliers.	
ARE THERE CONCERNS THAT THE POLICY COULD HAVE AN ADVERSE IMPACT BECAUSE OF:		
	YES / NO	RATIONALE
AGE	NO	
DISABILITY	NO	
GENDER	NO	
ETHNICITY	NO	
SEXUAL ORIENTATION	NO	
RELIGION / BELIEF	NO	
PREGNANCY / MATERNITY / PATERNITY	NO	
CULTURE	NO	
IF THE ANSWER TO ANY OF THE ABOVE IS YES, CONSIDER THE FOLLOWING:		
	TICK	RATIONALE
CAN IT BE DEMONSTRATED THAT SUCH A DISADVANTAGE OR ADVANTAGE CAN BE JUSTIFIED	N/A	
ADJUST THE POLICY TO MINIMISE THE DISADVANTAGE IDENTIFIED OR BETTER PROMOTE EQUALITY	N/A	
IF NEITHER OF THE ABOVE IS POSSIBLE, SUBMIT TO GOVERNANCE FOR REVIEW		

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