

Modern Slavery

Standard Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Allied Healthcare has taken and is continuing to take to ensure that modern slavery is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Allied Healthcare has a zero tolerance approach to any form of modern slavery and human trafficking. 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 chains.

Allied Healthcare implements its business strategy in an ethically, socially and environmentally responsible manner. We fully acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights. The IBHR informs all of our policies related to the rights and freedoms of every individual who works for us, either as a direct Allied Healthcare employee, locum or agency worker or indirectly through our supply chain. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our operations. Respect for the dignity of the individual – and the importance of each individual’s human rights – form the basis of the behaviours we expect in every workplace nationally.

We will not accept any form of discrimination, harassment or bullying and we require all of our managers to implement policies designed to increase equality of opportunity and inclusion for all Allied Healthcare employees including locums and agency workers. We have also developed and implemented policies and processes which are intended to extend these commitments through our supply chain.

As a Health and Care provider we recognise our responsibility to identify any customer’s or patients who may be a victim of modern slavery or human trafficking and we will ensure we adhere to our robust safeguarding procedures in work with our partners in following local modern slavery processes.

Our Business

Allied Healthcare has over 100 community based branches with around 12,000 employees. The Group includes Nestor Primecare Services Limited and the brands trading as Allied Healthcare, Primecare and Goldsborough. We work with 140+ Local Authorities located across England, Scotland, and Wales, and 100+ NHS Clinical Commissioning Groups providing home based domiciliary and continuing health care services through our brands Allied and Goldsborough. Our Primecare business, in addition to being a long-established GP out of hours’ provider, Primecare delivers services across the full healthcare spectrum. This includes NHS 111 telephony services, GP-lead medical centres, urgent care, forensic medical services, end of life care, healthcare in secure settings, dentistry and domiciliary care.

Allied Healthcare is part of the Aurelius Group which has in excess of 25 companies in its portfolio. Aurelius Group has a sales turnover of over 3.0 billion from a broad range of companies. Each business operates as a standalone business with a separate board and management structure. The Allied Healthcare board, led by the Chief Executive has overall responsibility for ensuring compliance with this statement and policy.

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Policies

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

- Human Rights policy and our Ethics Policy where we confirm that we will not tolerate or condone abuse of human rights within any part of our business or supply chains and will take seriously any allegations that human rights are not properly respected.
- Whistleblowing Policy, aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated and appropriate remedial actions taken and we will work closely with our social care and health partners ensuring our safeguarding policies and procedures dovetail with local procedures and best practice.
- A robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard.
- Employee Code of Conduct consistent with any professional codes of conduct.

Direct Communication

The Company encourages members of the public or people not employed by us to write, in confidence, to the Company Secretary or the Company’s Head of Risk to raise any concern, issue or suspicion of modern slavery in any part of our business.

Suppliers

Allied Healthcare operates a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. We intend as part of our due diligence to include an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and to include our anti-slavery policy as part of our contract with all suppliers and they will be required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we will require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. For UK based suppliers, they pay their employees at least the national minimum wage / national living wage (as appropriate) and to ensure that within their own supply chains, where UK based suppliers have overseas supply chains, that their employees pay is consistent with their national minimum wage requirements, working conditions are safe and fair, there is no child labour and working hours are not excessive.
4. We may terminate the contract at any time should any instances of modern slavery come to light.

Risk Assessments

Our supply chains include procurement of agency staff, medical consumables, facilities maintenance, utilities and waste management. We have conducted a risk assessment and will ensure we will take further steps to ensure we support the eradication modern slavery, that staff understand how to recognise modern slavery and the appropriate safeguarding reporting processes are followed should there be concerns within our supply chains, with customers or patients.

Performance indicators

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

- No reports are received from employees, the public, or law enforcement agencies or local safeguarding teams to indicate that modern slavery practices have been identified.

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Safeguards

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Responsibility for this Statement

Ultimate responsibility for the prevention of modern slavery rests with the Company’s leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

Assessment of effectiveness in preventing Modern Slavery

We understand that Modern Slavery risk is not static, and will continue our leading approach to mitigating this risk. We will do this by reviewing our supplier procurement processes to ensure they align our procurement processes to the principles of Ethical Trading for Healthcare and will review the training provision for the procurement team and care and clinical teams. We will publish this statement on our website and will review progress annually.

Approval for this statement

This statement was approved by the Chief Executive

Name: Luca Warnke

Signature: 

Date: 20 December 2016