

MODERN SLAVERY ACT POLICY

Date Approved	Approved by	Next review Date	Version
01/10/2017	Mohamoud Ahmed	01/10/2018	01

Policy Statement

This statement is made pursuant to the Modern Slavery Act 2015 and sets out the steps that OASIS Care & Training Agency (OASIS) 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. OASIS 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.

OASIS 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 OASIS 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 OASIS 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.

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

OASIS encourages members of the public or people not employed by us to write, in confidence, to our Executive Director or the Head of HR 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 personal protective clothing, office 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.

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. OASIS 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 Policy Statement

The Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Executive Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management 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 in supply chains. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the compliance manager.

Compliance with the Policy

Staff must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our service delivery or supply chains is the responsibility of all those working for us or under our control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If Staff believe or suspect a breach of this policy has occurred or that it may occur they must notify their manager as soon as possible. Staff should note that where appropriate, and with the welfare and safety of workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If Staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must raise it with your manager. 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 own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If Staff believe that they have suffered any such treatment, they should inform the compliance manager immediately. If the matter is not remedied, and an individual is an employee, they should raise it formally using our Grievance Procedure.

Communication and Awareness of this Policy

Training on this policy, and on the risk our service delivery faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

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 our Ethical Code of Practice for Social Care and will review the training provision for the procurement team and care teams.

Approval for this statement

This statement was approved by the Executive Director, Mohamed Yusuf.

*****END OF POLICY*****