

East Coast Community Healthcare CIC

Modern Slavery and Human Trafficking Statement

This statement sets out East Coast Community Healthcare's (ECCH) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 October 2015 to 30 September 2016.

Organisational Structure

East Coast Community Healthcare CIC (ECCH) is a social enterprise with an annual turnover above £36 million. ECCH provides a comprehensive range of NHS community health services across Norfolk and Suffolk. As a social enterprise, ECCH is owned by its staff and uses any surplus resources for the benefit of communities in Norfolk and Suffolk.

Further details about ECCH's activities can be found on our website - <https://www.ecch.org/>

Our Policy on Modern Slavery and Human Trafficking

ECCH fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role we play in its prevention. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

ECCH has internal policies and procedures in place that address the potential for modern slavery and human trafficking. All staff are responsible for the successful prevention of modern slavery and human trafficking.

We confirm the identities of all new employees and their right to work in the United Kingdom and ensure all employees are remunerated in accordance with statutory requirements.

Procurement and our supply chain

To identify and mitigate the risks of modern slavery and human trafficking in ECCH and its supply chains ECCH:

- Purchases products through the NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour;
- ECCH requests all its suppliers to comply with the provisions of the UK Modern Slavery Act (2015), especially where it is not purchasing through the NHS Supply Chain, through inclusion of a statement within tender specifications, new contract arrangements and renewed contracts. This spells out our commitment to ensuring that no modern slavery or human trafficking is related to our business;
- Where possible, builds long standing relationships with suppliers.

Due Diligence

ECCH undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation is developing a system of due diligence and reviews which will include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;

Training

ECCH has introduced a mandatory requirement whereby all staff are required to complete Level 2 Safeguarding Training which ensures staff understand and are able to identify and respond to those who are, or who are at risk of being, victims of modern slavery and human trafficking.

Aim

ECCH considers the principal risks related to modern slavery and human trafficking and identifies them as:

- Reputational
- Lack of assurance from suppliers
- Lack of anti-slavery clauses in contracts

Over the next year ECCH will:

- Take further steps to identify, assess and monitor potential risk areas, particularly in our supply chains;
- Undertake a review of all supply chain contracts to ensure suppliers have taken reasonable steps to prevent modern slavery and human trafficking;
- Design and rollout specific training sessions relating to modern slavery and human trafficking to be delivered to all staff;
- Monitor progress through the Integrated Governance Committee.

Board of Directors' Approval

The Board of Directors have considered and approved this statement and will continue to support the requirements of the legislation.



Tony Osmani
Chair



Jonathan Williams
Chief Executive Officer