

## **Modern Slavery**

Modern slavery covers slavery, servitude, forced and compulsory labour and human trafficking. It is often intertwined with organised crime and victims are treated as commodities and exploited for criminal gain.

The Modern Slavery Act, (the “Act”), was published in 2015 and builds upon existing legislation, consolidating a number of different offences into a single act. These offences are set out and defined below:

<b><i>Slavery</i></b>	Where a person exercises ownership over another
<b><i>Servitude</i></b>	Where a person is coerced into providing services and is unable to effect a change in his/her circumstances
<b><i>Forced Labour</i></b>	Where a person is forced to work or provide a service, fearing reprisal if he/she does not comply
<b><i>Human Trafficking</i></b>	Where a person arranges or facilitates the travel of another person with the knowledge or intention to exploit that person

Section 54 of the Act also brings into effect a new requirement for large organisations with UK operations to provide a statement detailing the steps that they have taken to ensure that modern slavery and human trafficking are not taking place within their business or supply chains.

This is the statement of Four Seasons Health Care Limited and its subsidiary companies (together “FSHC”).

## **Introduction**

As the leading independent healthcare provider in the UK, FSHC recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

FSHC is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This statement sets out the actions that FSHC has taken to understand potential slavery and human trafficking risks related to its business. It details a number of preventative measures put in place to minimise the risk of activity, which is prohibited under the Act, taking place within our business or supply chains.

This statement relates to actions and activities of FSHC during the financial year ended 31 December 2016. It also contains key actions that will be taken over the next 12 months and reported on in 2017.

## Organisational Structure

FSHC has a national network of around 270 care homes with 16,000 colleagues providing long-term residential and nursing care, intermediate care, respite care and palliative care to more than 13,000 residents.

## Responsibilities

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Corporate Policy Manager is responsible for managing and leading the development of new, and the review of existing, policies and procedures across FSHC. All policies are ratified by the Governance and Risk Committee (GRC) and approved by the Care, Quality and Safety Committee (CQSC). The policies relevant to the Act are set out under the section entitled "Protecting our Employees" and are subject to review on an annual basis.
- **Training:** The Learning and Development team are responsible for the training, development and coaching of all colleagues. The team will work with VinciWorks to develop an e-learning module, bespoke to our sector entitled "Modern Slavery Act – Preventing Exploitation" which we intend to roll-out in 2017. It is expected that the Learning and Development team will continue to work with VinciWorks in the future, reviewing training needs on an annual basis and developing solutions relevant to our business and its needs.
- **Risk Assessments, Governance and Control:** FSHC maintains a strategic risk register which is designed specifically to ensure compliance with both regulatory and legislative requirements and is reviewed on a monthly basis by the Leadership Team. This ensures that governance arrangements and controls, put in place to mitigate any risks identified, continue to be effective and fit for purpose.
- **Investigation/due diligence:** FSHC's internal audit team is responsible for periodically reviewing any areas of significant risk to assess whether the agreed governance arrangements and controls have been implemented successfully and are working effectively. All members of the internal audit team will be required to complete the e-learning module entitled "Modern Slavery Act – Preventing Exploitation" so that they are suitably equipped for this task.

## Protecting our Colleagues

FSHC is committed to treating all its colleagues in a fair and consistent manner and in accordance with our values: respectful, trusted, caring and making a difference. FSHC

operates the following policies that describe its approach to modern slavery risks and the steps to be taken to prevent human trafficking within its operations:

- **Employee Code of Conduct:** FSHC is committed to achieving and maintaining high standards of professional and ethical conduct amongst our colleagues. Our expectations are made clear through a number of existing policies including, but not limited to, the Anti-Bribery and Corruption Policy, the Bullying and Harassment Policy, the Equality and Diversity Policy and the Disciplinary Policy.
- **Recruitment Policy:** FSHC's Recruitment Policy requires any agency involved in the identification of candidates for FSHC to comply with all relevant legislation. FSHC actively reviews their policies and procedures on an on-going basis, and in light of emergent legislation, it only engages with reputable and compliant agencies.
- **Eligibility to Work Policy:** FSHC's Eligibility to Work Policy recognises that illegal workers are often the most vulnerable and exploited workers in the UK. It has therefore been designed to ensure that all FSHC colleagues are aware of their responsibilities in relation to tackling illegal working; namely to ensure that all current and prospective colleagues have had a right to work check, prior to them commencing work with FSHC, confirming that they are legally entitled to work in the UK.
- **Whistleblowing Policy:** FSHC's whistleblowing policy provides a mechanism for colleagues, (including agency staff and volunteers), residents/service users, relatives/visitors and others, to raise confidential concerns. FSHC's subscription to an external whistleblowing line, operated 24 hours a day by a reputable firm of healthcare solicitors, is designed to make it easy for people to make disclosures without fear of retaliation.
- **Employee Handbook:** FSHC's employee handbook provides information to all colleagues on their statutory rights, inclusive of sick pay, holiday pay and any other benefits that they might be entitled to by virtue of their employment.

### **FSHC's Supply Chains**

FSHC procures goods and services from established wholesalers. Whenever possible, FSHC only deals with UK Blue Badge certified businesses or specialists in supplying to the care sector.

FSHC does not manufacture or retail products and does not source directly from manufacturers. Instead FSHC relies on suppliers to source in a professional and ethical way, which is reflected in their contractual obligations.

FSHC is committed to ensuring that its suppliers adhere to the highest standards of ethics by way of a Procurement Code of Conduct. Suppliers are required to demonstrate the actions they are taking to protect against slavery, servitude, forced and compulsory labour and human trafficking. Violations of the Procurement Code of Conduct could lead to the termination of the business relationship.

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence reviews include:

- Evaluating the modern slavery and human trafficking risks of each new supplier
- Ensuring all new suppliers are compliant through reference to the FSHC supplier management system in which suppliers must submit written assurances that they are compliant with the terms of the Act, prior to entering into a contractual agreement
- Ensuring all current suppliers are compliant by requesting their written assurances that they are compliant with the terms of the Act, in order to preserve the existing business relationship. FSHC has already received written assurances from 87% of all such suppliers and the remaining 13% of suppliers will be required to submit their assurances by September 2017
- Requesting that all suppliers appoint an employee who holds the responsibility for the review of, and compliance with, the Act
- Monitoring suppliers' compliance through supplier performance management surveys
- Taking steps to improve sub-standard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our code of conduct, including termination of the business relationship
- Reporting any potential risks at the CQSC meetings

## **Training**

It is planned that FSHC will require all its Senior Leaders, Supply Chain Managers, HR professionals and internal auditors to complete the e-learning module entitled "Modern Slavery Act – Preventing Exploitation" by December 2017.

The e-learning module is intended to cover:

- FSHC's purchasing practices which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within FSHC
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger Together" initiative
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies
- The steps FSHC should take if suppliers or contractors do not implement anti-slavery policies in high risk scenarios, including their removal from FSHC's supply chains

## **Awareness Raising Programme**

As well as training a select group of colleagues, FSHC will be raising awareness of the Act by distributing documentation to all of its care homes and circulating a series of emails/notices on the FSHC intranet site.

The documentation will explain:

- The basic principles of the Act
- How employers can identify slavery or human trafficking
- What colleagues can do to flag up potential slavery or human trafficking issues to individuals within FSHC
- What external advice is available, for example through the Modern Slavery Helpline

## **Board Approval**

This statement has been approved by the FSHC Board, who will review and update it annually.

## **Signature**



**Tim Hammond**  
**Chief Executive Officer**  
**Four Seasons Healthcare**