BREWOOD
SKIN & FUNCTIONAL HEALTH CLINIC

MODERN SLAVERY

Note – this refers to employees but we expect the same standards from self employed practitioners

Modern Slavery is a crime that results in an abhorrent abuse of human rights. The Modern Slavery Act 2015, referred to as the Act, created offences of slavery, servitude and financial or compulsory labour.

Definitions of Modern Slavery

Slavery, following the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ownership of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he or she did own the person, which deprives the victim of their freedom.

Servitude is the obligation to provide services that are imposed by the use of coercion and includes the obligation of a serf to live on another person's property and the impossibility of changing his or her condition.

Policy

Forced or Compulsory Labour

This is defined in international labour law by the International Labour Organisations (ILO) Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that, work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to travel. This reflects the fact that a victim may be deceived by the promise of a better life or job, or maybe a child who is influenced to travel by an adult. In addition, the exploitation of a potential victim does not need to have taken place for the offence to be committed. It means that the

arranging or facilitating of the movement of the individual was with a view of exploiting them for sexual exploitation or non-sexual exploitation.

Child Labour

This is defined by the ILO as children under 12 years working in any economic activity, those aged 12-14 engaged in more than light work, and all children engaged in the worst forms of child labour.

This policy is for adult providers only.

Compliance Requirements

The transparency in supply chains provision within the Act seeks to address the role of businesses, across all sectors preventing modern slavery in their supply chains and organisations. The following guidance sets out how businesses can meet these requirements, as set out in the Act.

There is a requirement that any commercial organisation, in any sector, which supplies goods and services, and carries on a business, or part of a business, in the UK and is above a specified total turnover, must produce a slavery and human trafficking statement for each financial year of the organisation.

Regulations have set the total turnover threshold at £36 million,

Smaller Organisations

Where there is no requirement to produce a statement, organisations are encouraged to voluntarily produce a slavery and human trafficking statement, especially where they are contracting with organisations above the threshold. We, as a small provider may be asked to provide such a statement to commissioners of services, suppliers etc on our approach to modern slavery and find it helpful to have such a statement, hence this policy.

All businesses are encouraged by the Act to be open and transparent about recruitment practices, policies and procedures in relation to Modern Slavery and to take steps that are consistent and proportionate with their sector, size and operational reach.

Our Slavery & Trafficking Statement is at the end of this policy

Reporting

When staff believe there is a possibility of a modern slavery situation, they must in the first instance report it to their manager who will then take it forward by reporting it to the Modern Slavery Helpline via telephone, 08000 121 700, or online, https://www.modernslaveryhelpline.org/report.

Date: Jan 25

Review: July 26

Our Slavery and Trafficking Statement

For small businesses such as ours, awareness is the key to ensuring that this policy reflects the standards and ethical considerations we apply to our supply chain. We have in place:

- Due diligence checks to identify and assess potential risk areas such as agency staffing.
- The monitoring of potential risks in our supply chains by checking our supplier's commitment to modern slavery prevention.
- A robust recruitment and selection process to mitigate the risks of modern slavery entering our workforce.

Approval for this statement

This statement was approved by

Name Sarah Bywater. Date Jan 2025