

Modern Slavery Policy & Statement

Title	<u>Modern Slavery Policy & Statement</u>
Purpose	This Policy and statement is made as part of ASPECT Healthcare’s commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how ASPECT Healthcare operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.
Version No	3
Issue Date	April 2018
Approved by	HR Manager
Date of Approval	April 2018

Modern Slavery Policy

1. ASPECT Healthcare Limited is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. ASPECT Healthcare is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. ASPECT Healthcare provides appropriate training and awareness information for all of its staff. In particular:
 - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to Business Director.
5. Reports surrounding these issues are taken extremely seriously by our board of directors, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
 - Working with the appropriate organisations to improve standards,
 - Removing that organisation from our preferred supplier list,
 - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:

- The percentage of suppliers who sign up to an appropriate code or provide their own modern slavery statements,
 - The effectiveness of enforcement against suppliers who breach policies,
 - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
 - The level of modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
8. We would also recommend reading this in conjunction with our other policies, including our:
- Corporate social responsibility policy,
 - Anti-bribery / corruption policy, and
 - Whistle-blowing policy.

This policy was adopted on 5 April 2018 after being agreed by our board of directors.

Modern Slavery Statement

This statement is made as part of ASPECT Healthcare’s commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how ASPECT Healthcare operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act and relates to the financial year April 2019- April 2020

1 Our Business

ASPECT Healthcare Limited is a limited company operating in the recruitment sector. We place temporary, permanent and interim workers in the healthcare sector including Nursing, Doctors Allied Health Professionals (AHP) Health Science Services (HSS) and Non -Medical Non -clinical to public and private sector healthcare in the UK, Ireland, Middle East and Australia.

ASPECT Healthcare is an independent business.

1.1 Who we work with:

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff.

1.2 Other relationships:

As part of our business, we also work with the following organisations:

- NMC – Nursing and Midwifery Council
- GMC – General Medical Council
- HCPC – Health & Care Professions Council
- the Recruitment and Employment Confederation (www.rec.uk.com)

2 Our Policies

ASPECT Healthcare Limited has a modern slavery policy available upon request.

Suppliers are expected to adhere to our Supplier Code of Conduct and Terms and Conditions concerning ethical treatment of all employees and temporary workers.

All employees must be provided with a clear contract of employment, which complies with local legislation.

2.1 Policy development and review

ASPECT Healthcare's policies are established by our Directors and senior leadership team, based on advice from HR professionals, industry best practice and legal advice. We review our policies annually, or as needed to adapt to changes.

3 Our Processes for Managing Risk

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.
- Our staff are encouraged to bring any concerns they have to the attention of management.
- All ASPECT Healthcare employees have access to dedicated whistleblowing channels in order to raise concerns, questions or clarify processes. ASPECT Healthcare fully endorse transparency in this area.

4 Our Training

All of our staff receive training and support that is appropriate to their role on a regular basis. In particular:

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.
- Our staff are encouraged to discuss any concerns that they have.

This Statement is made to pursuant to Section 54 of the Act and constitutes ASPECT Healthcare's slavery and human trafficking statement.

