

# Zero Tolerance of Modern Slavery

Committed to a just, fair and compassionate workplace since 1996

## Modern slavery statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Smart Arrow Agency has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Smart Arrow Agency has a zero-tolerance approach to any form of modern slavery. 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 chain.

## Our business

We are a provider of healthcare staff, home carers and support workers within the health and social care sectors. We have been delivering health and social care services throughout the UK since 1996.

## Our people

- The organisation currently employs over 8,000 healthcare staff and over 400 office-based staff. We have dedicated teams of specialists to support all our staff including Clinical Governance, Human Resources and Learning & Development
- All our staff are directly employed on permanent contracts. We do not offer and have ever offered any 'zero hours' employment
- We are committed to fair working practices
- Our payments to all of our staff meet the requirements of the National Minimum Wage or above.

## Transparency

Smart Arrow Agency adopts a transparent approach to the recruitment and placement of our candidates and fully complies with the Duty of Candour principles and the Modern Slavery Act 2015. Smart Arrow Agency has robust contracts and / or service level agreements with all supply chains which promote transparency between both parties. Any incidents of Modern Slavery and / or Human Trafficking are documented, investigated (if appropriate) and referred appropriately

to the regulatory bodies in accordance with Smart Arrow Agency's Safeguarding and Accident and Incident Reporting Policies / Procedures and also in line with the Modern Slavery Act 2015.

## Our high-risk areas

Smart Arrow Agency has taken steps to minimise the risk of the occurrence of Modern Slavery and Human Trafficking through:

- Robust recruitment procedure which includes immigration checks
- Ensuring candidates have the correct right to work status and documents
- Appropriate clearance is obtained (via DBS, PVG, and Access NI respectively)
- Candidates are appropriately trained (including Safeguarding Adults and Children)
- Appropriately trained office staff
- Policies and procedures in place

**We have not identified any areas of the business that we consider to be high risk, but continue to monitor and assess all aspects of our policies and processes.**

## Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help**
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will
3. Whistleblowing policy. We operate a 'whistleblowing' policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals
4. Safeguarding Children Policy (England/Wales and Scotland) 5. Adult Safeguarding / Protection (England/Wales and Scotland)
6. Duty of Candour Policy.

Other policies and procedures that further support the identification and management of Modern Slavery and Human Trafficking are:

- Accident and Incident Reporting Policy
- Equality and Diversity Policy
- Complaints policies (England, Scotland and Wales).

## **Our suppliers**

Smart Arrow Agency operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred suppliers. This due diligence includes an online search to ensure each particular organisation has never been convicted of offences relating to modern slavery and additional on-site audits which include a review of working conditions. Our future anti-slavery policy will form part of our contract with all suppliers and they are 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 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 for modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

## **Training**

We regularly conduct training for our staff and care teams such as induction and contract specific training. This ensures our staff understand the signs of modern slavery and what to do if they suspect that it is taking place within our business and/or supply chain. To maintain standards, we will provide refresher training annually, or more frequently in line with changes to legislation or best practice.

## **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if: No reports have been received from employees, the public, police, UK Border Agency, Local Authority or other commissioning bodies to indicate that modern slavery practices have been identified.