

MODERN SLAVERY POLICY

This is a Controlled Document. This policy is issued by Optimum Patient Care Global Limited (the 'Company'). Failure to comply with this policy may lead to disciplinary and/or legal action where appropriate. The Human Resources (HR) Department and/or appropriate delegate should ensure the policy is communicated to all staff and contractors where applicable. The master copy of this document is kept on the Company Policies and SOPs Smartsheet and NAS drive. Staff may print this document for training and reference purposes but are responsible for regularly checking for more recent versions of the document.

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ABBREVIATIONS

HR	Human Resources
OPC or OPCG	Optimum Patient Care Global Limited
POL	Policy

BACKGROUND

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). The Act is designed to tackle slavery in the UK and consolidates previous offences relating to trafficking and slavery. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

This policy document provides an overview of our zero-tolerance approach to modern slavery. We assess risks across supply chains and have amended our procedures to ensure that our contractors, consultants, suppliers and downstream partners (who directly implement our projects), in areas where a potential risk may occur, actively work towards eradicating modern slavery.

PURPOSE

The purpose of this policy is to set out the steps the Company will take to comply with the Modern Slavery Act 2015 and our commitment to acting ethically and with integrity in our organisations relationships across the UK and internationally. In addition, we are implementing processes to ensure that our systems and controls are effective in ensuring that slavery is not taking place in our supply chains.

This document sets out the aim of the prevention of opportunities for modern slavery to occur within the Company or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

APPLICABILITY

This policy applies to Company staff, and associated persons such as secondees, third party and freelance contractors. Compliance with this policy is a legal and contractual duty for staff and contractors. Failure to comply with this policy may lead to disciplinary and/or legal action.

RESPONSIBILITY

Role	Accountable for
Directors	<ul style="list-style-type: none">○ Committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the Company or in any of the supply chains.○ Ensuring this policy complies with the legal and ethical obligations.
General Manager & Line Managers	<ul style="list-style-type: none">○ The prevention, detection and reporting of modern slavery in any part of the Company or supply chain.○ Avoid any activity that might lead to, or suggest, a breach of this policy.○ Day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

- Responsible for ensuring all employees reporting to them understand and comply with this policy and are given adequate and regular training on it and issue of modern slavery in supply chains.
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Employee

- Read and comply with this policy.
 - Encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company or supply chains of any supplier at the earliest possible stage.
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Human Resources

- Encourage openness and support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
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POLICY

1.0 Introduction

1.1 The Company operates a number of internal policies which ensure that we are conducting business in an ethical and transparent manner. Our policies which contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chain include the following policies.

Recruitment: Our recruitment policy is designed to ensure compliance with employment law and encourages our employees to report any concerns related to the activities of the Company and our supply chain. Our HR team manage all recruitment activities with recruiting managers and only use reputable recruitment sites to source candidates and carry out appropriate background checks.

Equal Opportunities: We have a range of controls to protect staff from poor treatment and/or exploitation, which complies with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and fair access to training and development opportunities.

Safeguarding: We adhere to the principles inherent within our safeguarding policies.

Whistleblowing Our whistleblowing policy encourages employees to report any concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain. Our management team are required to investigate anything raised and take action where needed in response.

Confidentiality: Our confidentiality policy sets out the requirements placed on all staff when sharing information. It lays down the principles that must be observed by employees and contractors (where applicable) who have access to person-identifiable information or confidential information. All staff need to be aware of their responsibilities for safeguarding confidentiality and preserving information security.

1.2 The Company will continue to review our policies to ensure that they are effective and appropriate. Subject to changes in legislation, this Policy will be reviewed and updated accordingly.

2.0 Procurement and Supply Chains

2.1 Our approach to procurement and our supply chain includes:

- Ensuring that our suppliers are carefully selected through our robust supplier selection criteria/processes.
- Requiring that the main contractor provides details of its sub-contractor(s) to enable the Company to check their credentials.
- Ensuring any contractor who sub-contracts or assigns a contract seeks Company consent before doing so.
- Ensuring the Company's service agreement documents contain a clause on human rights issues.
- Ensuring the Company's service agreement documents also contains clauses giving the Company the right to terminate a contract for failure to comply with labour laws.
- Supplier adherence to our values. The Company is zero tolerant to slavery and human trafficking and thereby expect all our direct and indirect suppliers/contractors to follow suit.

3.0 Our Approach

3.1 To mitigate risk within our supply chains, we have implemented and communicated the following systems and controls.

- Implement an anti-slavery policy or anti-slavery guidance, as appropriate.
- Ensure staff awareness of these issues and the guidance and policy on how to manage them.
- Identify high-risk areas in our supply chain and ensuring mitigations are in place.
- Work with our suppliers and taking action to strengthen supply chains.

DISSEMINATION & TRAINING

Dissemination: This document will be made available to staff and contractors via Smartsheet and NAS drive or on request from the HR Department. This may also be in the form of a global notice sent to staff and contractors notifying them of the release of this document.

Training: Training on this document will be provided during induction of staff and contractors or as required by their training needs. Additional and/or regular training will be provided as necessary, based on training requirements to ensure continued awareness and compliance with this document.

MONITORING

Failure to comply with this policy will trigger HR processes, in accordance with the Company’s disciplinary policy as set out in the ‘Staff Handbook’. Compliance with this document will be monitored by Company senior management or appropriate delegates. This may include regular and/or ad hoc compliance checks and audits where appropriate or warranted. This document is to be reviewed annually or sooner where necessary.

EQUALITY IMPACT ASSESSMENT

An Equality Impact Assessment has been completed. It is understood that no employee will receive less favourable treatment on the grounds of disability, age, sex, race, religion or belief, gender reassignment, pregnancy or maternity, marriage or civil partnership, working patterns or Trade Union membership or non-membership in relation to the application of this policy. The Equality Impact Assessment is included in Appendix A.

RELEVANT DOCUMENTS

- Recruitment Policy
- Safeguarding Policy
- Whistleblowing Policy
- Confidentiality Policy
- Sustainability and Carbon Offsetting Policy
- Supplier Diversity Policy
- Equality and Diversity Policy

VERSION HISTORY

VERSION	EFFECTIVE DATE	REASON FOR CHANGE	AUTHORS
V1.0	21-03-23	First Draft	Emma-Jane Loveridge
V1.1	04-04-23	Review and final version created	Emma-Jane Loveridge

APPENDIX A: Equality Impact Assessment

Scope	Response
1. What are the main aims and objectives of the policy?	To set out the aim of the prevention of opportunities for modern slavery to occur within the Company or supply chain.
2. Who will be affected by it?	All employees, contractors and suppliers.
3. What are the existing performance indicators/measures for this and what are the outcomes you want to achieve?	Due diligence checks with current suppliers.
4. What information do you already have on the equality impact of this policy?	This is a new policy and replaces any current informal documentation in place
5. Are there demographic changes or trends locally to be considered?	No
6. What other information do you need?	None

Assessment	Yes	No	Response
1. Could the policy discriminate unlawfully against any group?		X	The policy is designed to ensure equity of treatment.
2. Can any group benefit or be excluded?		X	The policy ensures all staff are treated in a consistent manner and appropriate to their role.
3. Can any group be denied fair & equal access to or treatment because of this policy?		X	The policy ensures all groups are treated in a consistent manner.
4. Can this actively promote good relations with and between different groups?	X		Due to the consistency of approach everyone will be treated equally.
5. Have you carried out any consultation internally/externally with relevant individual groups?	X		Consultation held with line managers.
6. Have you used a variety of different methods of consultation/involvement?		X	Discussion method only.
7. Have external factors been considered in the development of this policy?		X	No
8. Are there any external implications in relation to this policy?		X	No