



## Modern slavery Act 2015 - Annual statement 2024/25

### 1. Introduction

This Statement is made pursuant to article 54 of the Modern Slavery Act 2015 and in addition to article 4 of the Human Rights Act 1998 and sets out the steps that FCMS NW LTD (FCMS) has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses domestic servitude, forced labour, criminal exploitation, and sexual exploitation. FCMS has a zero-tolerance approach to any form of modern slavery or human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place.

### 2. Aim of this statement

The aim of this statement is to demonstrate that FCMS follows good practice, and all reasonable steps are taken or to be further taken to prevent slavery and human trafficking.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking, with the Quality and Risk Department taking lead responsibility for compliance in the supply chain.

Where gaps have been identified FCMS will set out key priorities for 2024/25 to deliver its commitment towards demonstrating that FCMS follows good practice, and all reasonable steps are taken to prevent slavery and human trafficking.

### 3. About the organisation

FCMS is a Social Enterprise health and wellbeing services provider who are passionate to deliver exceptional care to all our patients and service users, across several geographies, seeing approximately 950,000 patient contacts every year.

Our workforce comprises of employed staff, workers and contractors who carry out a wide range of roles, working together to provide integrated and coordinated care and support to those using our services. Some of our patient-facing staff include the following: Nurses, GP's (including Registrars), Health Care Assistants, Physician Associates, Allied Health Professionals, Receptionists, Drivers, Dental nurses, Dentists, Echocardiographers, Sonographers, Patient Liaison Officers plus more.

### 4. Our policies on slavery and human trafficking

FCMS is aware of its responsibilities towards patients, service users, employees and the local community and expects all suppliers of FCMS to adhere to the same ethical principles. FCMS is



committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships.

FCMS recognises that healthcare settings may become a target for modern slavers hoping to monopolise on current staffing challenges.

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

**Recruitment and selection policy:** FCMS operates a robust recruitment policy which sets out our vetting and barring procedures, including conducting eligibility to work in the UK checks for all directly employed staff. FCMS aligns its recruitment process to the National NHS Employment Checks/Standards which includes checks for identity and UK address, criminal record, work health assessment, professional registration and qualifications, right to work, employment history and reference checks.

**Registration checks for clinicians' policy:** Approved external agencies are limited in number to maintain a qualitative list of suppliers, these are annually reviewed and audited to provide assurance that pre-employment clearance has been obtained for agency staff to safeguard against human trafficking or individuals being forced to work against their will. FCMS aligns its onboarding process for sessional and agency contractors to the National NHS Employment Checks/Standards which includes checks for identity and UK address, criminal record, work health assessment by self-declaration, professional registration and qualifications, right to work, employment history and

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

**Safeguarding Policies:** We adhere to the principles inherent within both our Safeguarding Children and Adults policies. These provide clear guidance so that our workforce are aware as to how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.

**Raising Concerns (Whistleblowing) Policy:** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.

**Staff handbook:** FCMS's staff handbook is comprised of all HR policies combined; of which can be found on the staff intranet

## 5. Working with suppliers

Currently FCMS has identified areas for improvement within its compliance with the consolidation of offences relating to trafficking and slavery within the Modern Slavery Act 2015. FCMS aims for the year 2024/25 for a review of all its supply chains initially,



with a view of confirming that such actions are not taking place in the form of supplier self-declaration. All existing suppliers will be written to annually in order to confirm compliance with the Act and provide additional information on their organisation, their supply chains, the areas of risk & the due diligence undertaken.

The Quality and Risk Team will then ensure that due diligence is undertaken for all new and ongoing suppliers of goods and services to the organisation and their associated supply chains.

## **6. Training**

Advice and training about Modern Slavery and human trafficking is available to staff through our Safeguarding training at a level appropriate to their roles and responsibilities, and in our safeguarding policies and procedures.

Members of the Quality and Risk Team are to attend additional external Modern Slavery training courses.

Awareness is also raised through information sharing on FCMS's staff intranet and our public website. This has recently been updated in line with national guidance.

## **7. 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 are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

## **8. Board of directors' approval**

The Board of Directors has considered and approved this statement and will continue to support the requirements of the legislation.

**Signed on behalf of the Board of Directors:**

NAME: Samantha Marsh

ROLE: Chief Operating Officer

DATE: *Samantha Marsh*

**This statement is to be reviewed annually.**