

Modality Partnership Modern Slavery Statement 2022/2023

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The Modern Slavery Act 2015 is designed to consolidate various offences relating to human trafficking and slavery. The provisions in the Act create a requirement for an annual statement to be prepared that demonstrates transparency in supply chains pertaining to goods or services. In line with all businesses with a turnover greater than £36 million per annum, and as a provider of services, the Modality Partnership provides the following statement in compliance with the Act.

Our Business

We are a primary care Super Partnership that was established in June 2009. There are currently over 40 practices as part of the group that form nine divisions (areas) across the country in Birmingham, Walsall, Hull, Airedale, Wharfedale and Craven, East Surrey, Wokingham, Lewisham, Mid-Sussex, and St Helens. Our vision is to become a leading primary care provider locally nationally.

Assurance and our approach to Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Rigour in our recruiting processes and staff welfare is our priority. Our Anti-Slavery approach reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure this is not taking place anywhere in our business or within our supply chains.

This statement is published on our partnership website and contained within our staff handbook.

Due Diligence and Processes

As part of our initiative to identify risk and mitigate against such risks, our National Board and the Chief Executive Officer take responsibility through our management teams for ensuring that our practices identify pertinent risks.

We have in place systems and approaches across our business, our trading partners and our supply chains to:-

- Identify inappropriate employment practices including a robust approach to recruiting staff into Modality Partnership that includes identity, DBS and qualification/reference checks, and checks to ensure our people we recruit are legally entitled to work in the UK.
- Setting strict standards for conduct within the workplace, referencing this within our contracting documentation and staff handbook for all staff as well as mirroring the NHS code of conduct in respect of the expected standards for managers.
- Policies to guide staff on routes for whistleblowing, grievance, disciplinary and bullying and harassment, providing them with assurance on our management role and providing support with relevant workforce to support such policies, such as centralised HR professionals, Wellbeing Champions and Guardians and Freedom to Speak Guardians.
- Through our mandatory training for all staff to raise awareness and responsibilities in relation to the Act, and in particular towards our patients.
- Additional management training and wellbeing support awareness has been undertaken and which will form part of mandatory management training to ensure all employees with

line management responsibility are consistent in their approach to staff recruitment, employment rights and awareness and support to ensure the correct management of employee welfare.

- Additionally, in acknowledgment of pressures which create extra demand on our services, for example the COVID 19 Pandemic, and the increased seasonal demands on General Practice, the recruitment of additional workers is a necessity to ensure safe service delivery. Some of the additional required workers included voluntary workers, all of which were recruited in line with the Modality Partnership recruitment policy. All volunteers that provide support to our service provision are background checked in the same way as paid employees who have pre-employment checks carried out.

Volunteers are issued with honorary contracts following their clearance checks, which also includes rights to working in the UK and a DBS check. All volunteers are given the same onboarding, induction, and site orientation as paid employees. Volunteers support the service on an ad hoc basis and hours are monitored in line with working time directives to ensure adequate rest breaks are provided.

Supplier and Procurement adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we operate in line with principles of responsible sourcing. All members of staff have a personal responsibility for the successful prevention of such practices taking place with our procurement department taking the lead for compliance with our suppliers and those we contract with. The organisation is committed to training our Procurement and Supplies Team on the implications of the Act in order that they can support the wider organisation on its implementation.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach in this area.

We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

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

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2023.

Vincent Sai
Modality Group Chief Executive
March 2023