**2018 Modern Slavery and Human Trafficking Statement**

**Introduction**

The **INSERT PRACTICE NAME** continues to recognize its responsibility to address and mitigate the risk of modern slavery and human trafficking in its operations. This statement sets out our commitment and actions taken to do our part to eradicate these abhorrent practices, as well as meet the requirements of the UK Modern Slavery Act 2015 and the California Transparency Act through the end of our financial year, 30 June 2018.

**Structure, Business & Supply Chains**

We are a small business but do ensure that all staff that we employ are aware of their rights and responsibilities. Recognizing the important need to respond to the modern slavery crisis, we have also requested assurances from our suppliers to ensure that they too are aware of their responsibilities. Our patients are a high priority and all staff have received some training around identifying and dealing with those who may have been involved in modern slavery and human trafficking.

**Policies**

We will also strive to ensure that slavery and human trafficking is not taking place within any of our supply chain business partners and will not tolerate such activities either within the supply chain or within any part of the Kingthorne Group Practice business. We believe that it is the responsibility of every employee to help ensure all of our activities meet our high standards for behaviour and business ethics, and establishes accountability for compliance with law and policy.

We believe our training addresses the need for open dialogue about potential violations and concerns, and provides confidential reporting methods through our Practice Manager and Caldicott Guardian. Where required we have access to translation services through the Big Word.

We completely oppose the exploitation of workers through any form of forced or bonded labour, slavery, human trafficking or other labour practices that involve harsh or inhumane treatment. Therefore we require our suppliers to comply with these principles and to share them with any subcontractors they may use. Each site is responsible for implementation of this requirement and annual confirmation that it has taken place.

With regard to our own labour practices, we set standards for a diverse workplace that provides a safe and healthy environment and that complies with or exceeds local law. The Kingthorne Group Practice requires an effective programme be in place to help ensure compliance with labour laws involving migrant and foreign national workers.

**Due Diligence Processes**

We are currently contacting reviews of all business partners. These reviews include a check for either a compliance statement and a check whether adverse media, where modern slavery issues can and in fact have been found. Of course, simple termination of a contract relationship may not always be the most appropriate response based on circumstances, so substantive findings of adverse media about a business partner are handled on a case-by-case basis, according to the circumstances.

**Risk Assessment/Mitigation**

As described above a working group was formed to consider more fully our company’s risk of exposure to these practices and additional activities to help mitigate these risks. This began with a comprehensive review of the internal and external operations that could potentially be exposed to a modern slavery risk, including our own labour and suppliers. From this, we will be able to develop a continuing action plan that will target the highest risk operations. Given the numbers and complexity of our patients, we accept that this will need to be a phased approach.

In the full financial year 2018, we plan to conduct compliance assessments on new and existing suppliers. Where we identify non-compliance, we will work with our suppliers on remedial action plans to help ensure issues are addressed and corrected. In the small number of cases where suppliers are unwilling to work with us to achieve compliance, we will, as a last resort, terminate our business relationships.

 To help ensure our senior management team is aware of issues within our supply chain, we have developed a formal rapid escalation process whereby any modern-day slavery issues or other serious violations of our standards are reported within 24 hours, along with the conclusion of any investigations and remedial action plans. We share the assessment results on a monthly basis across our senior management team to ensure they have appropriate visibility of this program and an understanding of the risks within our supply chain.

 We want to work with suppliers who are open and transparent, so in order to reinforce this commitment, we request that our suppliers agree to our right of unannounced assessments at any time in their operating day/week.

**Training and Awareness**

We plan to run an annual update around the issues surrounding modern slavery and human trafficking and are looking to outsource an online training session if possible.

**Effectiveness and Performance Indicators/Monitoring**

We recognize that the risks from modern-day slavery change, and as such our approach to preventing modern-day slavery will be reviewed annually by the Protocols group. This approach will monitor and review:

 •Effectiveness of risk assessment processes

•Staff training programs

•Assessment programs (where applicable); and

•Reporting and escalation processes.

This statement is made pursuant to the relevant legal requirements of the United Kingdom.