

Collaborative Procurement Partnership (CPP)

Modern Day Slavery Policy

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Each document has an individual record of amendments. The current amendments are listed on this page. A new version of the document should be created by the policy author each time the pages are updated.

Version No	Author	Purpose / Change	Date
1.0	Director of Business and Performance	Creation of Policy Final approved by Members Board	16/04/2020
2.0	Director of Business and Performance Business Manager (Corporate)	Transfer to new policy template. Remove Slavery and Human Trafficking Statement to be covered separately. Include reference to read and date on Cascade and monitoring arrangements Contract system to monitor supplier checks in place. Removed Equality Impact Assessment. Reviewed at SMT 07/07/2021 Approved at Executive Board 21/07/2021	21/07/2021

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1. Introduction

- 1.1. The purpose of this policy is to set out Collaborative Procurement Partnership (CPP) responsibilities, and of those working for CPP, in observing and upholding the company's position on Modern Day Slavery and to provide information and guidance to those working for CPP on how to recognise and deal with Modern Day Slavery issues.
- 1.2. Modern Day Slavery is a crime and a violation of fundamental human rights. It takes various forms which include slavery, 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.

2. Policy Statement

- 2.1. CPP are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls, to ensure Modern Day Slavery is not taking place anywhere in our own business, or in any of our supply chains. This policy supports our commitment to ensuring there is transparency in our approach to tackling Modern Day Slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

3. Scope of Policy

- 3.1. This policy applies to all employees on CPP contracts of employment, and those staff who work within CPP in the provision of services to CPP clients but who are not CPP employees.
- 3.2. CPP expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we require that our suppliers will hold their own suppliers to the same high standards.
- 3.3. This policy therefore applies to all persons working for us, or on our behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

4. Roles and Responsibilities

- 4.1. CPP's Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 4.2. CPP's Director of Business and Performance is the Single Point of Contact (SPOC) for suspected Modern Day Slavery issues and / or any other fraud bribery and corruption issues affecting the organisation.
- 4.3. CPP's Executive Board has primary and 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 Day Slavery.

- 4.4. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.
- 4.5. All stakeholders are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and shall be addressed to the Business and Performance Team.

5. Compliance with the Policy

- 5.1. The prevention, detection and reporting of Modern Day Slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.
- 5.2. This policy covers CPP as a business.
- 5.3. Tower supply chain complies with Supply Chain Coordination Limited (SCCL) Modern Slavery Policy.
- 5.4. Employees shall:
 - Avoid any activity that might lead to, or suggest, a breach of this policy.
 - Notify your line manager or the Head of HR as soon as possible if you believe or suspect that a conflict with this policy has occurred or is likely to occur in the foreseeable future.
 - Raise concerns anonymously via our internal human resources feedback portal <https://cpp.hive.hr/opendoor-kiosk>.
 - Raise any concerns about issues or suspicion of Modern Day Slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.
 - Notify your manager or the Head of HR as soon as possible if you believe or suspect a breach of this policy has occurred, or that it may occur. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.
- 5.5. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Day Slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you shall inform the Head of HR immediately. If the matter is not remedied, and you are an employee, you shall raise it formally using our Grievance Procedure, which can be found on the CPP SharePoint.

6. Breaches of the Policy

- 6.1. Any employee who breaches this policy, including failing to notify an appropriate person about criminal actions of which employees are aware of may lead to disciplinary action potentially resulting in dismissal for misconduct or gross misconduct.
- 6.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.
- 6.3. Please note this policy does not form part of any employee's contract of employment and we may amend it at any time.

7. Training

- 7.1. CPP's Modern Day Slavery Policy is promoted as a key policy document for all employees to read. CPP employees are required to input a date when they have read and understood the policy on our internal human resources employee record. Compliance of staff reading this policy is monitored against the date entered. Alerts will automatically be sent annually to remind staff to refresh their understanding of the policy.
- 7.2. Where applicable CIPS Ethical Procurement Module (2021) will be made available to employees.

8. Monitoring

- 8.1. Modern Day Slavery matters will be scrutinised at the Audit and Risk Committee as a standing agenda item and members will provide clear and demonstrable support for all work in this area. This is achieved through submission and review of the Modern Day Slavery Policy and any other matters as they arise.
- 8.2. Our contract and supplier management process will include an onboarding requirement to include a supplier check of their Modern Slavery Policy and Human Trafficking Statement. CPP will conduct checks on those that fall into high-risk categories. Audit may include but not limited to making enquiries into their operations, how they source labour and materials, the prices they pay to their suppliers further down the supply chain. The CPP contract register and checks against Modern Day Slavery and Human Trafficking will be managed by the Business and Performance Team.

9. Keywords

- 9.1. Slavery, human trafficking, human rights, servitude, forced labour, compulsory labour, liberty.

10. Related Policies and Documentation

10.1. CPP have several policies and other documentation which support the organisation in prevention and mitigation of the risk of Modern Day Slavery existing in the organisation, and to ensure an open and transparent culture. These include:

- Slavery and Human Trafficking Statement
- Raising Concerns (Whistleblowing) policy
- Anti Fraud Bribery and Corruption Policy
- Gifts and Hospitality Policy
- Conflict of Interest Policy
- Health and Safety Policy
- Grievance Policy and Procedure
- Code of Conduct (Anti Fraud Bribery and Corruption)

11. Additional Measures

1.1. In addition to policies, CPP will ensure that:

- Right to Work documents are checked for all employees.
- All employees have a written contract of employment.
- All new employees are provided with information on their statutory and contractual rights including sick pay, holiday pay and any other benefits they may be entitled to.
- The Company is compliant with all relevant legislation regarding the National Minimum Wage and the Equality Act 2010

12. References

12.1. Modern Slavery Act 2015

13. How to report any suspected Modern Day Slavery

The Director of Business and Performance is the Single Point of Contact (SPOC) for suspected Modern Day Slavery issues and / or any other fraud bribery and corruption issues affecting the organisation. Staff should report any suspicions here in the first instance via any of the following methods:

Telephone – 07980 795312

Email – claire.povey@cpp.nhs.uk

Anonymous reporting facility – CPP Internal Feedback Portal
<https://cpp.hive.hr/opendoor-kiosk>

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