

Arden & GEM Modern Slavery and Human Trafficking Statement 2025

NHS Arden & GEM CSU (Arden & GEM) fully supports the Government's objectives to eradicate Modern Slavery and Human Trafficking and recognises the significant role the NHS has to play in both combatting it and supporting victims.

This includes being strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses. As part of the NHS Net Zero commitment outlined in the 2020 "Delivering a 'Net Zero' National Health Service" report, we have published the NHS Supplier Roadmap. As part of the roadmap, a Sustainable Supplier Assessment will be available in 2023 to enable suppliers to benchmark their progress against the Roadmap. Suppliers will perform an annual self-assessment, which will also include Modern Slavery requirements. Requirements of suppliers include, but are not limited to, publication of an ethical sourcing policy, completion of a supply chain risk assessment and Modern Slavery audits in supply chain hotspots identified through risk assessments.

The NHS standard contracts which NHS England publishes, govern how Arden & GEM engages with its suppliers and require compliance with relevant legislation, including the Modern Slavery Act 2015. The 2022 updates to these contracts strengthen our position on Modern Slavery, extending requirements and the option to terminate for breaches of social and labour laws.

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 policy: We operate a robust recruitment policy including conducting eligibility to work in the UK checks for all directly employed staff.

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: All staff have a responsibility to keep children, young people and adults who may be at risk of harm safe - this page contains links to policy and procedures which must be followed.

Arden & GEM is governed by:

- the Care Act 2014 which sets out a clear legal framework for how the health and social care system should protect adults at risk of abuse or neglect and the Care and Support Statutory Guidance.
- the Statutory guidance on inter-agency working to safeguard and promote the welfare of children.
- the NHS England safeguarding policy

All Arden & GEM Staff must follow the Safeguarding Procedure for Dealing with Concerns for Vulnerable Children and Adults.

Raising Concerns (Whistleblowing) Policy: We operate a Freedom to Speak Up 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.

Procurement Policy: In compliance with the consolidation of offences relating to trafficking and slavery within the Modern Slavery Act 2015, the Procurement Team continuously reviews its supply chains with a view to confirming that such actions are not taking place.

Our Modern Slavery Policy aligns directly with NHS England's Modern Slavery Policy, and we assign any concerns for further investigation and offer support to individuals that have suffered any detriment as a result of whistleblowing.

Board of directors' approval

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