

Phoenix Health Solutions Ltd

Modern Slavery & Human Trafficking Policy

Date Approved by Board	Version number	Issue date	Review date
4.6.26	1	4.6.26	4.6.27

REQUIREMENT	ACTION
Who should be aware of the policy and where to access it	All employees, directors, contractors, agency workers and associates of Phoenix Health Solutions.
Who should understand the policy	All employees, directors, contractors, agency workers and associates of Phoenix Health Solutions.
Who should have a good working knowledge of the policy	All employees, directors, contractors, agency workers and associates of Phoenix Health Solutions.
Whether the policy should be included in the General Induction Programme and/or departmental specific induction programme	Yes
Where is the policy available	Policy folder, Shared Drive Policy Folder
Information contained within this policy will be disclosed only in accordance with applicable contractual obligations, regulatory requirements, and data protection legislation.	

1. Policy Statement

Phoenix Health Solutions Ltd provides healthcare services and works with employees, contractors, suppliers, recruitment agencies and subcontractors as part of its service delivery and supply chain arrangements.

Phoenix Health Solutions is committed to preventing modern slavery and human trafficking in all aspects of its operations and supply chains. We recognise our responsibility to uphold human rights and act ethically and with integrity in all business relationships.

We have a zero-tolerance approach to modern slavery and are committed to implementing effective systems and controls to ensure modern slavery does not take place within our organisation or supply chains.

This policy supports compliance with the Modern Slavery Act 2015 and aligns with our commitment to ethical business practices and safeguarding vulnerable individuals.

2. Scope

This policy applies to:

- All employees
- Directors
- Agency workers
- Contractors and consultants
- Volunteers
- Suppliers, subcontractors, and business partners

All individuals and organisations working on behalf of Phoenix Health Solutions Ltd are expected to comply with this policy.

3. Definition of Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It includes:

- Slavery
- Servitude
- Forced or compulsory labour
- Human trafficking
- Debt bondage
- Child labour
- Exploitative labour practices

Victims may be subjected to coercion, threats, deception, or abuse of power for personal or commercial gain.

4. Responsibilities

Board of Directors / Senior Management

Senior leadership is responsible for:

- Ensuring compliance with the Modern Slavery Act 2015
- Promoting a culture of ethical business conduct
- Reviewing modern slavery risks annually
- Approving and monitoring this policy

Managers

Managers are responsible for:

- Implementing this policy within their areas of responsibility
- Ensuring staff understand modern slavery risks
- Reporting concerns promptly
- Ensuring safeguarding concerns relating to suspected modern slavery are escalated appropriately in accordance with organisational safeguarding procedures.

Employees and Workers

All staff are responsible for:

- Remaining alert to indicators of modern slavery
- Reporting any concerns or suspicions
- Completing any required training
- Reporting safeguarding concerns where modern slavery or exploitation is suspected.

5. Risk Assessment and Due Diligence

Phoenix Health Solutions Ltd will take reasonable steps to identify and assess modern slavery risks in its operations and supply chains.

Prior to engagement, suppliers may be required to provide evidence of compliance with employment legislation, right-to-work verification processes, and their own Modern Slavery Policy where appropriate.

Measures include:

- Supplier due diligence checks
- Procurement assessments

- Contractual obligations requiring compliance with modern slavery legislation
- Review of high-risk suppliers and sectors
- Investigation of reported concerns

Where significant risks are identified, appropriate mitigation actions will be implemented.

5.1 Healthcare Workforce Risks

As a provider of healthcare staffing and clinical services, Phoenix Health Solutions Ltd recognises that certain activities may present a higher risk of modern slavery and labour exploitation.

Potential risk areas include:

- Use of agency, temporary, locum, or subcontracted healthcare professionals.
- Overseas recruitment and international workforce supply.
- Reliance on third-party recruitment agencies and workforce providers.
- Vulnerable workers who may be at increased risk of exploitation.
- Workers who may be unfamiliar with UK employment rights and protections.
- Supply chain providers supporting healthcare service delivery.

To mitigate these risks, Phoenix Health Solutions Ltd will:

- Verify the identity and right to work of all workers.
- Undertake appropriate pre-employment checks in accordance with NHS Employment Check Standards.
- Conduct due diligence on recruitment agencies and workforce suppliers.
- Ensure workers are engaged voluntarily and receive lawful pay and employment conditions.
- Provide clear reporting mechanisms for concerns relating to exploitation, coercion, or abuse.
- Support safeguarding processes where concerns relating to modern slavery involve patients, staff, contractors, or members of the public.

6. Recruitment Practices

Phoenix Health Solutions Ltd is committed to fair and lawful recruitment practices and will:

- Verify the identity and right to work of all employees
 - Ensure recruitment agencies operate legally and ethically
 - Pay employees directly into personal bank accounts
 - Comply with National Minimum Wage legislation
 - Avoid practices that could contribute to forced labour
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7. Supply Chain Expectations

We expect suppliers and contractors to:

- Comply with the Modern Slavery Act 2015
- Maintain policies and procedures to prevent modern slavery
- Cooperate with due diligence requests
- Notify us immediately of any actual or suspected incidents

Failure to meet these expectations may result in termination of contracts or business relationships.

8. Reporting Concerns

Any employee, contractor, volunteer, or stakeholder who suspects modern slavery must report concerns immediately to:

- Their line manager; or
- Safeguarding Lead (Dr C Tobin); or
- Through the organisation's whistleblowing procedure.

Reports will be treated seriously and investigated appropriately.

Where concerns relate to actual or suspected modern slavery involving patients, service users, staff, contractors, or members of the public, Phoenix Health Solutions Ltd will manage such concerns in accordance with its Safeguarding Policy and relevant local safeguarding procedures. Where appropriate, referrals may be made to statutory agencies, safeguarding authorities, law enforcement, or the Modern Slavery Helpline: 08000 121 700.

No individual will suffer retaliation for raising concerns in good faith.

9. Training and Awareness

Phoenix Health Solutions Ltd will provide appropriate training and awareness activities to help staff:

- Understand modern slavery risks
- Recognise warning signs
- Know how to report concerns
- Understand organisational responsibilities

Additional training may be provided to procurement, recruitment, safeguarding, and management staff.

Phoenix Health Solutions Ltd will maintain records of modern slavery and safeguarding training undertaken by staff. Training compliance will be monitored and reported through the organisation's governance arrangements. All staff will receive appropriate awareness training during induction, with refresher training provided periodically to ensure ongoing understanding of modern slavery risks, indicators, and reporting procedures.

10. Monitoring and Review

This policy will be reviewed at least annually or sooner if:

- Legislation changes
- Organisational structures change
- Significant risks or incidents arise

Compliance with this policy will be monitored through governance and assurance processes.

10.1 Measuring Effectiveness

Phoenix Health Solutions Ltd will assess the effectiveness of its approach to preventing modern slavery and human trafficking through a range of governance, assurance and performance measures, including:

- Completion and monitoring of staff induction and refresher training relating to modern slavery and safeguarding.
- Monitoring compliance with recruitment, right-to-work and employment checks.
- Completion of supplier due diligence assessments and review of supplier compliance documentation.
- Monitoring and investigation of any reported concerns, incidents or safeguarding referrals relating to modern slavery or labour exploitation.
- Review of whistleblowing reports and concerns raised through governance processes.
- Annual review of modern slavery risks within the organisation and its supply chain.
- Audit findings, governance reviews and corrective actions implemented where improvements are identified.

The Executive Management Group will review relevant information as part of the organisation's governance framework to ensure that controls remain effective and that risks relating to modern slavery and human trafficking are appropriately managed.

11. Related Policies

This policy should be read alongside:

- Safeguarding Policy
- Whistleblowing Policy
- Recruitment and Selection Policy
- Equality, Diversity and Inclusion Policy
- Code of Conduct
- Information Governance Policy