

Modern Slavery Statement

In accordance with the Modern Slavery Act 2015, Anglian Community Enterprise (ACE) Community Interest Company makes the following statement on the steps we have taken in 2018/19 to ensure that Modern Slavery, for example, slavery and human trafficking, is not taking place in any part of the organisation's business or supply chains.

ACE's Organisational Structure

ACE is an employee owned social enterprise providing a comprehensive range of community health and well-being services, including three GP Practices, predominately across Essex and Suffolk. These services are provided from a range of settings including clinics, patients' homes and inpatient wards.

Our social mission is to use every element of what we do – be it service provision, employment, purchasing or investing – to improve the health and well-being of the communities in which we work.

Each year we generate income approaching £54 million and employ around 850 employees. ACE is limited by shares, with 71% of employees being shareholders.

We invest 100% of the profits from day to day operations into our services and programmes that support the wider well-being of the communities we serve, many of which are operated by local voluntary sector partners.

We work collaboratively with organisations and practitioners (including GPs) that provide health and well-being, and social care services in community and domestic settings across North East Essex.

We are accountable to patients and informed by their experiences, ACE's strategic priorities over the next 3 years include:

- Further integration of services to ensure seamless patient-centred services, designed to improve patient outcomes and experience;
- Supporting people to stay well, to live well with the conditions they have and supporting them to recover effectively;
- Service transformation, including organisational wide technology and workforce innovation.

Due to the range of services that we provide, ACE recognises that we may be at risk of modern slavery and human trafficking. We are committed to developing and embedding a proactive approach to mitigate this risk.

We monitor complaints, patient experience, risk-management, incidents and safeguarding. We triangulate the data to assure ourselves, commissioners and service users that ACE's culture is safe.

We also work with partners such as NHS Protect, District and Borough Councils and Essex Police to identify serious and complex economic crime, reduce the impact of crime and drive improvements in anti-crime work within the community.

Supply Chain

ACE is a commissioner of a number of supply chain services, in respect of Care Closer to Home Services.

We source clinical products and equipment from reputable supply companies. We recognise the active role we play in ensuring our suppliers are also committed to preventing slavery and human trafficking.

We continue to develop ACE's approach to managing the supply chain. We will review the policies of sub-contractors, ensuring they place an equally high priority on these matters.

ACE's Relevant Policies

To identify and mitigate the risks of modern slavery in ACE, we have robust recruitment policy and procedures, which support compliance with the national NHS Six Employment Checks; Care Quality Commission Standards – Regulation 5: Fit and Proper Persons; NHS Litigation Authority Standards and the Companies Act 2006.

In addition, other external agencies providing temporary employees are approved within the NHS governance frameworks.

ACE has a number of controls in place to ensure compliance with employment legislation:

- Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy which encourages employees to raise concerns as soon as possible so that lessons can be learned and matters dealt with. Under this policy employees can raise a concern about risk, malpractice or wrongdoing that they think is harming the service we deliver.
- All members of employees are expected to comply with the NHS Standards of Business Conduct which they will have received during their induction.
- Declaration of Interests; Declaration of Hospitality, Gifts and Sponsorship Policy ensures that ACE is open, transparent and honest in the way that it conducts its business. It aims to ensure that the organisation has in place adequate

safeguards against conflict or potential conflict of interest and procedures to prevent bribery.

- ACE's Procurement Policy provides a framework for ACE employees when considering any procurement of goods or services, and the procedures that should be followed. ACE employees must always be honest, fair and impartial in their dealings with suppliers. Relationships with suppliers must always be dealt with on a professional basis with proper regard to ethics and propriety.
- ACE's Mandatory Training Policy supports ACE to provide the highest quality care to patients and to minimise risk in all the services provided. In order to achieve this there is a systematic approach to mandatory training which ensures increased patient safety and reduced clinical risk.

Safeguarding

ACE is committed to working with the main statutory agencies to promote safer care and an informed workforce. All employees and volunteers across the organisation regardless of the role they perform, have a part to play in preventing harm and abuse from occurring and taking action when concerns do arise.

Employees have a duty to recognise and report concerns or suspicions of abuse promptly and without delay. Ignoring abuse is not an option.

All new starters are required to undertake safeguarding training at corporate induction which includes the escalation and reporting of safeguarding concerns including modern slavery.

All Employees are then required to undertake Tier 1 Safeguarding Training every 3 years, with Safeguarding Levels 2 and 3 for all patient care employees every 3 years.

ACE's Safeguarding Adult's Policy references national and local policy/legislation in respect of modern slavery.

Front-line employees also have access to apps that can provide instant support and information such as the National Safeguarding App.

Awareness-raising programme

ACE has raised awareness of modern slavery issues by distributing information on Freedom to Speak Up and Safeguarding in its monthly internal communication 'Quality Matters' to all employees.

ACE has two Freedom to Speak Up Guardians whose contact details are regularly communicated to employees.

Corporate Induction covers safeguarding processes that include modern slavery and human trafficking.

We review our procurement processes to ensure that they meet the required modern slavery standards.

Board Approval

This statement has been approved by Anglian Community Enterprise (ACE) Community Interest Company's Board who will review and update it annually.

A handwritten signature in black ink that reads "David Harrison". The signature is written in a cursive style with a long horizontal flourish at the end.

David Harrison
Executive Chair

Date: 7th October 2019