

Modern Slavery policy

MediLink Consulting Limited's procedure for Modern Slavery' policy is fully compliant with [NHS Employment Check Standards](#), [Care Inspectorate Safer Recruitment Guidance](#) and [Social Care & Social Work Improvement Scotland Regulations 2011](#), and [RQIA requirements](#).

Throughout this document "the company" and "we" refer to MediLink Consulting Limited

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 Act and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulation 2015 (the "Act"). It sets out the steps taken Medilink Consulting Ltd, to prevent modern slavery and human trafficking in its business and supply chain.

Medilink Consulting Ltd fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role we can play in both combatting it and supporting victims. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

Medilink Consulting is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.

Medilink Consulting is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.

Medilink Consulting provides appropriate training and awareness information for all of its staff.

In particular:

- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
- Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to the Medilink Board of Directors

Reports surrounding these issues are taken extremely seriously by our board of Directors, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:

- Working with the appropriate organisations to improve standards,
- Removing that organisation from our preferred supplier list,
- Passing details to appropriate law enforcement bodies.

We regularly monitor our risks in this area through the use of relevant key performance indicators, including:

- The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
- The percentage of workers and/or candidates supplied from audited businesses / our preferred supplier list,
- The effectiveness of enforcement against suppliers who breach policies,
- The amount of time spent on audits, re-audits, spot checks, and related due diligence,

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and the level of modern slavery training and awareness amongst our staff.

As part of our efforts in this area, we publish a modern slavery statement on an annual basis.

We would also recommend reading this in conjunction with our other policies, including our:

- Anti-bribery / corruption policy, and
- Whistle-blowing policy.

We recognise that being in the healthcare industry, we are exposed to risks relating to the potential violation of human rights in areas including modern slavery and human trafficking. We are conscious that such risks can arise in certain areas of the sector, in particular nursing, aged care provision, as well as in the manufacturing of healthcare equipment. We are committed to monitoring such risks in our business and in our wider supply chain and to mitigating them.

Steps taken to date include:

People

We promote a workplace environment that is fair, open and respectful, and one that protects the rights and dignity of all employees. We operate people practices, contracts of employment and collective agreements that are lawful and aligned to our Code and values.

- We confirm the identities of all new employees, temporary workers and contractors and their right to work in the United Kingdom, and pay all our employees above the National Living Wage
- Our Respect at Work, Grievance and Voicing your Concerns for Staff policies additionally give a platform for our employees to raise concerns about poor working practices.
- We use social media to raise awareness and invest in training to ensure front line staff are aware of and able to respond to incidents of modern slavery

Whistleblowing

Our whistleblowing policy sets out our commitment to ensure people are free to question things and raise anything they are concerned about and specifically modern slavery and human trafficking. We encourage people to speak up by raising matters with their Danielle Gifford Compliance Manager.

Procurement and our supply chain

- Our current due diligence process includes a modern slavery assessment.
- When procuring goods and services, we additionally apply specific Terms and Conditions that require suppliers to comply with relevant legislation.

Review of effectiveness

We intend to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in our supply chains.

In 2023/24, our anti-slavery programme will also:

- continue to support all staff to understand and respond to modern slavery and human trafficking, and the impact that each, and every individual working in the healthcare sector can have in keeping present and potential future victims of modern slavery and human trafficking safe
- ensure that staff have access to training on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information and will help staff develop the skills to support individuals who come into contact with health services
- review our safeguarding policies and training programmes to ensure that Modern Slavery and human trafficking reflect potential requirements in pending reforms relating to the pre-criminal needs of people involved in human trafficking and modern slavery
- undertake a risk assessment on transparency in supply chain including an overview of products, services and suppliers procured.

Compliance & Audit

We will meet the NHS's standard by using robust safeguarding and compliance procedures underpinned and enabled our recruitment software. This prevents mandatory parts of the process from being missed out or circumnavigated.

We conduct regular internal audits of all our compliance processes. These are carried out by our Compliance Manager on a monthly basis to demonstrate that we adhere to legislative, contractual and industry best practice. As part of our NHS framework, ISO and REC accreditation, we are also subject to external audits. We also welcome client audits.

Signed by: Danielle Gifford

Job title: Compliance Manager

Signature: 

Definitions contained in the Modern Slavery Act 2015

Section 1 - Slavery, servitude and forced or compulsory labour

(1) A person commits an offence if—

(a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or

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(b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

(2) In subsection (1) the references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention.

(3) In determining whether a person is being held in slavery or servitude or required to perform forced or compulsory labour, regard may be had to all the circumstances.

(4) For example, regard may be had—

(a) to any of the person's personal circumstances (such as the person being a child, the person's family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons;

(b) to any work or services provided by the person, including work or services provided in circumstances which constitute exploitation within section 3(3) to (6).

(5) The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude, or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

Section 2 – Human trafficking

(1) A person commits an offence if the person arranges or facilitates the travel of another person (“V”) with a view to V being exploited.

(2) It is irrelevant whether V consents to the travel (whether V is an adult or a child).

(3) A person may in particular arrange or facilitate V's travel by recruiting V, transporting or transferring V, harbouring or receiving V, or transferring or exchanging control over V.

(4) A person arranges or facilitates V's travel with a view to V being exploited only if—

(a) the person intends to exploit V (in any part of the world) during or after the travel, or

(b) the person knows or ought to know that another person is likely to exploit V (in any part of the world) during or after the travel.

(5) “Travel” means—

(a) arriving in, or entering, any country, (b) departing from any country, (c) travelling within any country.

(6) A person who is a UK national commits an offence under this section regardless of—

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- (a) where the arranging or facilitating takes place, or
 - (b) where the travel takes place.
- (7) A person who is not a UK national commits an offence under this section if—
- (a) any part of the arranging or facilitating takes place in the United Kingdom, or
 - (b) the travel consists of arrival in or entry into, departure from, or travel within, the United Kingdom.

Section 3 – Meaning of Exploitation

(1) For the purposes of section 2 a person is exploited only if one or more of the following subsections apply in relation to the person.

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- (2) The person is the victim of behaviour—
- (a) which involves the commission of an offence under section 1, or
 - (b) which would involve the commission of an offence under that section if it took place in England and Wales.

Sexual exploitation

- (3) Something is done to or in respect of the person—
- (a) which involves the commission of an offence under—
 - (i) section 1(1)(a) of the Protection of Children Act 1978 (indecent photographs of children), or
 - (ii) Part 1 of the Sexual Offences Act 2003 (sexual offences), as it has effect in England and Wales, or
 - (b) which would involve the commission of such an offence if it were done in England and Wales.

Removal of organs etc

- (4) The person is encouraged, required or expected to do anything—
- (a) which involves the commission, by him or her or another person, of an offence under section 32 or 33 of the Human Tissue Act 2004 (prohibition of commercial dealings in organs and restrictions on use of live donors) as it has effect in England and Wales, or
 - (b) which would involve the commission of such an offence, by him or her or another person, if it were done in England and Wales.

Securing services etc by force, threats or deception

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- (5) The person is subjected to force, threats or deception designed to induce him or her—
 - (a) to provide services of any kind,
 - (b) to provide another person with benefits of any kind, or
 - (c) to enable another person to acquire benefits of any kind.

Securing services etc from children and vulnerable persons

- (6) Another person uses or attempts to use the person for a purpose within paragraph (a), (b) or (c) of subsection (5), having chosen him or her for that purpose on the grounds that—
 - (a) he or she is a child, is mentally or physically ill or disabled, or has a family relationship with a particular person, and
 - (b) an adult, or a person without the illness, disability, or family relationship, would be likely to refuse to be used for that purpose.