

## Modern Slavery Act – Annual Statement 2024/25

### Introduction

This statement sets out Locala Community Partnership's commitment to preventing slavery and human trafficking in all its corporate activities and within its supply chains.

Modern Slavery is a serious and often hidden crime in which people and children are exploited for criminal gain. The impact can be devastating for the victims. Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude.

The statement outlines the steps we have taken during the financial year 2024/25 to ensure compliance with the Modern Slavery Act 2015 and minimise any associated risks. It covers the activities of Locala Community Partnerships CIC.

### What is Modern Slavery?

The Modern Slavery Bill was introduced into Parliament on 10 June 2014 and passed into UK law on 26 March 2015. The Modern Slavery Act is an Act to make provision about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims. Trafficking is characterised by the recruitment and movement of the child or young person by threat or deception for the purpose of exploitation which may include sexual/ criminal exploitation, forced labour, domestic servitude and removal of organs.

### About Locala Community Partnerships ('Locala')

Locala Community Partnerships was formed in 2011 as a Community Interest Company (CIC) and an independent, not-for-profit social enterprise. We provide a range of Health and Care services through NHS and Local Authority commissioned community services to people in Kirklees, Calderdale, Bradford, Stockport, Tameside, Wigan and Leigh. We employ around 1500 people who are all committed to delivering the highest quality of care.

Community health care covers a range of services, from health visitors to speech and language therapists, district nursing as well as dental care, school nurses, foot care, sexual health and physiotherapy. Our services are offered in a number of locations including; health centres, surgeries, schools/colleges and community settings as well as in the home.

We also work closely with local GPs, local NHS organisations, Local Authorities, Third sector organisations, and Integrated Care Boards (ICB) to deliver a coordinated approach to care and support. As a not-for-profit social enterprise, any financial surplus is re-invested back into supporting patient care and increasing our social impact in the communities we serve.

### Our supply chains/working with suppliers

We are fully aware of the responsibilities we bear towards patients, employees, and the local community and as such, have a strict set of ethical values that we use as guidance regarding our commercial activities. We therefore expect that all our suppliers adhere to the same ethical principles. Locala purchases a significant number of products through NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour. Where other suppliers are used, Locala colleagues are expected to work with the Procurement team when looking to engage with any new suppliers of goods and services so that appropriate checks can be undertaken.

Areas that are commonly deemed to be most at risk in relation to Modern Slavery within our sector are providers of agency staff and facilities management contractors. We use only specified, reputable employment agencies to source labour and always verify the practices of

any new agency before accepting workers from that agency. The revised internal procedures relating to use of Bank and Agency workers have been implemented and now have clearer expectations on pre-employment checks being carried out.

## **Locala Policies and Procedures**

All colleagues have a personal responsibility for the successful prevention of Slavery and Human Trafficking.

Locala's policies, procedures, governance and legal arrangements are robust, ensuring that proper checks and due diligence are applied to ensure compliance with legislation, including the Human Rights Act 1998, Equalities Act 2010 and the Modern Slavery Act 2015.

These policies provide guidance and advice to colleagues in assessing and managing risks in relation to modern slavery and human trafficking and additionally offer a platform for colleagues to raise concerns about poor working practices.

Key policies and procedures include:

### ***Recruitment and Selection Policy***

Locala's Recruitment and Selection Policy sets out the standards that must be adhered to by the organisation, and ensures comprehensive checks and balances are in place to reduce as far as possible the likelihood of individuals being employed who have been trafficked, or who are the victims of modern slavery.

We conform to the NHS employment check standards within our workforce recruitment and selection practices, including through our managed service provider contract arrangements.

### ***Equality Diversity and Inclusion Policy***

Locala is committed to ensuring equality of access to employment and training opportunities. Our Equality, Diversity and Inclusion policy aims to eliminate unlawful and unfair discrimination and ensure that all groups and individuals within the community benefit through having equal access to employment opportunities provided.

### ***Safeguarding Policy***

Locala's commitment to supporting the eradication of modern slavery is reflected in the Safeguarding Adults and Safeguarding Children policies. These Policies include modern slavery as a type, or pattern or form of abuse which can relate to an adult or child at risk. They also require all Locala employees to complete training on Safeguarding adults and children. Both Policies were reviewed and updated during 2024/2025.

### ***Freedom To Speak Up Policy***

Locala encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains, of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Employees, people we support and their families or others who have concerns are encouraged to speak up and procedures are in place to support this to happen in a confidential manner and without fear of reprisal.

Locala's Freedom to Speak Up Policy offers guidance to colleagues on raising concerns confidentially and our Freedom to Speak Up Guardians and Advocates are available to provide support and signposting for colleagues. This Policy was refreshed and approved by the Locala Board in April 2024.

## **Training and Awareness**

Locala has a robust safeguarding training plan and requires all Locala employees to complete safeguarding training in adherence to the roles and responsibilities set out in the Royal College

of Nursing intercollegiate guidance 2018/19. Safeguarding training compliance is monitored by the Safeguarding team, and is reported within Locala's governance structure.

The Safeguarding Team have provided information and guidance on the Modern Slavery Act and how to respond to concerns about modern slavery. This is available to all colleagues through Locala's Intranet (ELSIE) and is regularly updated by the Safeguarding team.

In addition, monthly briefing sessions are delivered by the Locala Safeguarding team on a range of topics, modern slavery included. There have been several presentations on Modern day Slavery, with on average 200 people attending during Safeguarding Week. The briefings are recorded and are available to all colleagues through the intranet. The 30-minute briefings have been successful due to the flexible approach to learning.

The Safeguarding team have also developed a **new safeguarding newsletter** which has been disseminated to Locala colleagues. The newsletter enables the sharing of learning opportunities internally and externally to aid safeguarding compliance.

With the controls in place around our supply chain and employment practices as described, the Locala Board considers the risk of Modern Slavery and Human Trafficking within our supply chain and employment of staff to be low. To date Locala has had no reports of modern slavery and human trafficking within our organisation or in our supply chains.

## Future Actions

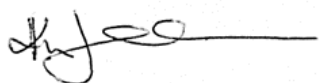
In the forthcoming financial year, Locala plans to further develop procedures for identifying, preventing and mitigating risks related to modern slavery and human trafficking. Planned actions include:

- Ongoing review and monitoring of supply chains and supporting staff in recognising and addressing modern slavery
- Assessing the implications of the NHS (Procurement, Slavery and Human Trafficking) Regulations 2024 consultation outcomes
- Continuing awareness initiatives for service users and their families regarding available support
- Maintaining training programmes, tracking safeguarding training compliance, and providing necessary support across the organisation.

## Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2025.

It has been formally approved by the Board of Locala Community Partnerships CIC and signed on their behalf. They have approved this statement for publication on the Locala website.



Karen Jackson, Chief Executive

August 2025

**References:** Royal College of Nursing (2019) Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff