



TRISTONE

HEALTHCARE

Modern Slavery & Human Trafficking Policy

This policy is implemented to support the abolition of modern slavery and human trafficking. We are committed to maintaining a non-discriminatory and respectful working environment for all our colleagues. We do not enter into business with any organisation which knowingly supports, or is found to be involved in, slavery, servitude and forced or compulsory labour.

Implemented: May 2022

Introduction

Tristone believe in the promotion and protection of human rights. Our ethos and values are inextricably linked to this belief. Therefore, we are:

- Committed to acting in an ethical and socially responsible manner; and
- Remain committed to actively contributing towards the eradication of modern slavery and human trafficking.

It is noted from the onset that this policy relates to colleagues and suppliers. For information about protecting children and young people from child trafficking and modern slavery, colleagues and other stakeholders should refer to safeguarding policies aligned to individual businesses within the Tristone Community.

Policy Statement

Tristone are committed to the aims and principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

Anti-slavery policies were introduced by the government in the United Kingdom in 2015 under the Modern Slavery Act 2015. These policies were set out to ensure organisations supply chains are slavery free.

The regulations describe actions that must be taken within our organisation to avoid any risk of having part-taken in slavery throughout the supply chain.

Companies are required to provide an anti-slavery policy if they comply with the following:

- It is a 'body corporate' or a partnership, wherever incorporated or formed
- It carries on a business, or part of a business, in the UK
- It supplies goods or services
- It has an annual turnover of £36 million or more

Tristone have implemented this policy in the interests of supporting the abolition of modern slavery and human trafficking.

We seek to consistently maintain a non-discriminatory and respectful working environment for all our colleagues. We believe colleagues should feel confident that they can expose wrongdoing without any risk to themselves, which we consider as a fundamental principle of safe practice.

Our safer recruitment procedures and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK. This helps to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

What is Modern Slavery & Human Trafficking?

Sadly, the concept of 'slavery' has not been confined to history. 'Human trafficking' is probably a more recognisable term, and this is included in the wide definition of modern slavery, along with:

- Forced work, through physical or mental threat;
- Being owned or controlled by the employer through actual or threatened mental or physical abuse;
- Being treated as a commodity or being traded as property;
- Being physically constrained or having restrictions placed on freedom of movement.

Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting.

Victims of modern slavery can be any age, gender, nationality, and ethnicity. They are tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation.

They may not recognise themselves as a victim.

Signs and Indicators of Modern Slavery

The following list is not exhaustive but does cover key indicators or signs that an individual is a victim of modern slavery. Individuals may:

- Appear scruffy, malnourished, or injured.
- Present in a way that is anxious, afraid, or unable to make eye contact.
- Work long hours, wearing unsuitable clothing or have the wrong equipment for the job.
- Live in overcrowded, poorly maintained properties and/or are the curtains always closed.
- Behave like they're being instructed by someone else, picked up/dropped off at the same time and place every day or don't have access to money or identification.

Our Supply Chain

Our supply chains are limited. We procure goods and services from a restricted range of UK suppliers, which includes legitimate:

- Stationery/office equipment suppliers;
- Furniture retailers;
- Vehicle dealers;
- Independent consultancy services;
- Recruitment businesses.

Tristone aim to maintain a best practice approach to aid combatting slavery and human trafficking. Additionally, it is essential that our suppliers understand and appreciate the standards of business conduct that are expected of any company. As such, we only seek to engage with reputable organisations.

Our commercial activities mean that we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Resources & Information: Countering Modern Slavery & Human Trafficking

The Gangmasters and Labour Abuse Authority (GLAA) have produced a film highlighting modern day slavery in the workplace.

It is aimed at employers and is designed at raising awareness and helping your staff identify the signs of labour exploitation.



The film then shows three scenarios before ultimately ending with the right approach to dealing with a suspected case of modern slavery. It is advised that all colleagues take the time to view the video, and view the resources below:

[HELP Them leaflet download here](#)

[Gangmaster Victims poster download here](#)

The Independent Anti-Slavery Commissioner (IASC) provides an SME Toolkit, jointly commissioned by the STOP THE TRAFFICK and Shiva Foundation, that seeks to provide practical guidance for small and medium sized enterprises (SMEs) on how they can prevent modern slavery in their business operations.

