

HCA HEALTHCARE UK POLICY

HUMAN TRAFFICKING

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1 INTRODUCTION

Human Trafficking is a crime against humanity. It involves an act of recruiting, transporting or transferring, harbouring, receiving or exchanging control over a person through a use of force, coercion, abuse of vulnerability, fraud or deception or other means, for the purpose of exploiting them.

HCA Healthcare UK (HCA) is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (“human trafficking and slavery”). We strongly believe that we are responsible for promoting ethical and lawful employment practices. These practices are also required to be followed by our suppliers, subcontractors or business partners (collectively referred to as “Suppliers”).

2 SCOPE

This policy covers all HCA employees and Suppliers.

3 DOCUMENT STATEMENT

HCA will not tolerate slavery, servitude, forced or compulsory labour in our business, or in the manufacture of products we use or sell, and will not accept products or services from Suppliers who employ or utilise slavery, servitude, forced or compulsory labour in any manner.

This Policy defines how HCA will make efforts to eradicate human trafficking and slavery from not only within the organisation but also from our global supply chains.

4 DEFINITIONS

Servitude The state of being a slave or completely subject to someone more powerful.

Forced or Compulsory Labour Any work or services which people are forced to do against their will under the threat of some form punishment.

Human Trafficking The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or

services, slavery or practices similar to slavery, servitude or the removal of organs.

5 ROLES AND RESPONSIBILITIES

5.1 Employees

Employees are responsible for:

- Being vigilant for signs of trafficking in patients.
- Being vigilant for signs of trafficking in visitors to HCA.
- Being vigilant for signs of trafficking in suppliers to HCA.
- Reporting concerns to the Line Manager.
- Complying with the Contracts Approval Policy.

5.2 Managers

Managers are responsible for:

- Being vigilant for signs of trafficking in patients.
- Being vigilant for signs of trafficking in visitors or patients of HCA.
- Being vigilant for signs of trafficking in suppliers to HCA.
- Reporting any concerns relating to human trafficking to the Purchasing Team or Local HR Team.
- Educating their teams about slavery and human trafficking.
- Complying with the Contracts Approval Policy especially when engaging with new suppliers.

5.3 Suppliers

Suppliers are expected to:

- Comply with the legal requirements as set out in the Modern Slavery Act 2015.
- Comply with the Contracts Approval Policy and Supplier Code of Conduct to certify that their work practices are ethical and do not breach legislation or this policy in any way.
- Allow HCA to carry out audits periodically to monitor compliance with this policy.

5.4 Human Resources Team

The Human Resources Team are expected to:

- Act as a point of escalation when an employee has a concern about someone being a victim of human trafficking.
- Providing guidance on the implementation of the policy to Line Managers.

5.5 Purchasing Team

The purchasing team are expected to:

- Act as a point of escalation when an employee has a concern about a supplier who may be involved in human trafficking.
- Providing guidance on the correct use of the Contracts Approval Policy and Suppliers Code of Conduct.
- Conducting supplier audits to monitor compliance with this policy.

6 PROCEDURE

6.1 Why are people trafficked?

The primary purposes for which people are trafficked are:

Sexual exploitation

Forcible or deceptive recruitment for prostitution or other forms of sexual exploitation.

Domestic servitude

Employment in private homes where ill treatment, humiliation and exhausting working hours are common. This can also involve sexual and physical abuse.

Bonded/forced labour

In construction, agriculture, horticulture, marine farming, textiles, catering, nail bars, care homes, and car washes, or any other industry. This can also include forced involvement in illicit activities such as cannabis cultivation and pirate DVD selling.

Criminal activity

Including cannabis cultivation, street crime, forced begging and benefit fraud.

Organ harvesting

Organs are removed and sold on for profit.

Child trafficking

For begging, benefit fraud, illegal adoption, forced marriage, domestic servitude and sexual exploitation. When children (i.e. under 18 years old) are trafficked, no violence, deception or coercion needs to be involved, simply transporting them into exploitative conditions constitutes trafficking.

Often trafficked people have taken what is presented as a job opportunity, are lied to about the work, pay and conditions, and subsequently find themselves in situations akin to slavery. People are trafficked both internationally and within a country.

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6.2 Signs of trafficking

HCA is a diverse organization with employees, patients, visitors, bank members and Consultants from a variety of backgrounds. In order to comply with this policy it is important that our employees are aware of the signs of human trafficking and know what to do in the event they suspect someone might be a victim.

There are no definitive factors by which to identify trafficking, however, the following points could indicate that someone is a potential victim of trafficking:

- The person has migrated locally or internationally for work commonly associated with trafficking.
- The person is always accompanied by someone who appears controlling, who insists on giving information.
- The person has no official means of identification or suspicious looking documents, or someone else is in possession of their identification or documentation (e.g. passport, identification or travel documents).
- Children and young people may have an unclear relationship with the accompanying adult and give inconsistent information about their age.

The person:

- Is withdrawn and submissive, seem afraid to speak to a person in authority and the accompanying person speaks for them.
- Gives a vague and inconsistent explanation of where they live, their employment or schooling.
- Has old or serious injuries left untreated. Has delayed presentation and is vague and reluctant to explain how the injury occurred or to give a medical history.
- Is not registered with a GP, nursery or school.
- Has experienced being moved locally, regionally, nationally or internationally.
- Appears to be moving location frequently.
- Their appearance suggests general physical neglect.
- They may struggle to speak English.

Trafficked people may not always self-identify as victims of trafficking. Trafficking victims can be prevented from revealing their experience to health care employees from fear, shame, language barriers and a lack of opportunity to do so. It can take time for a person to feel safe enough to open up.

Possible healthcare issues of trafficked people:

- Evidence of long term multiple injuries
- Indications of mental, physical and sexual trauma
- Sexually Transmitted Infections

- Pregnant, or a late booking over 24 weeks for maternity care
- Disordered eating or poor nutrition
- Evidence of self-harm
- Dental pain
- Fatigue
- Non-specific symptoms of Post-Traumatic Stress Disorder
- Symptoms of psychiatric and psychological distress
- Back pain, stomach pain, skin problems; headaches and dizzy spells

6.3 What to do in the event of suspected trafficking

If an employee suspects someone is a victim of human trafficking they should seek advice from the local HR team or, in the case of suppliers, the Purchasing Team before taking any action.

In all cases for of suspecting human trafficking (including children, young people and adults) the company will seek to gather more information about the situation before considering involving any third party. This will normally require speaking to the suspected victim in private, without anyone who usually accompanies them.

If translation is necessary, only use an independent, qualified and police checked interpreter or Language Line. Especially do not use anyone accompanying the person as an interpreter.

When speaking to someone who you believe may be a victim of human trafficking, consider the following:

- Make sure they are reassured that it is safe for them to speak
- Do not make promises that cannot be kept
- Only ask non-judgmental relevant questions
- Allow the person time to share their experiences
- Do not let concerns about challenging cultural beliefs stand in the way of making informed assessments about the safety of a child, young person or adult
- Ensure the health needs of the person are addressed by continuing to provide care (if applicable).
- React in a sensitive way that ensures the safety of the person
- Discuss any concerns with the Local Safeguarding Lead who can provide support and advice
- Access additional external support if appropriate (see paragraph 6.4)

6.4 External Support

In the event it is established than an individual is likely to be, or confirmed to be a victim of trafficking it will be necessary to involve external agencies in order to ensure the matter is handled correctly.

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The National Referral Mechanism (NRM) is the process by which an individual is identified as a victim of modern slavery. Referrals to the NRM can only be made by authorised agencies known as First Responders. Authorised agencies in the UK are the police force, the UK Border Force, Home Office Immigration and Visas, social services and certain Non-Governmental Organisations.

If an individual is not considered to be in immediate danger, the local police station should be contacted to discuss a referral to the NRM. However, if it is considered that someone is in immediate danger, call 999. The Metropolitan Police with Stop the Traffik have a 24 hours hotline for victims to call or to report suspected trafficking, which is 0800 783 2589.

Support for adult victims of human trafficking is also available in England and Wales through the Salvation Army which holds the government victim care contract. The Salvation Army has a 24-hour confidential helpline (0300 303 8151) for professional advice and support and referrals which operates seven days a week. The contacts for Northern Ireland and Scotland are: Migrant Help on 07766 668781 and Scotland: TARA on 0141 276 7724. For potential child victims of trafficking please call your Local Authority Children's Services or the NPSCC Child Trafficking Advice Centre on 0808 800 5000.

For further guidance on how to identify and support victims of human trafficking, please see the booklet produced by the Department of Health which details guidance and actions for healthcare employees who suspect that their patient may be a victim of human trafficking (link below).

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/187041/A5_Human_Trafficking_Guidance_leaflet.pdf

7 HCA SUPPLIERS

HCA is committed to a work environment that is free from human trafficking, as defined within this policy.

HCA takes our responsibility for promoting ethical and lawful employment practices seriously and these practices are also required to be followed by our suppliers, subcontractors or business partners (collectively referred to as 'Suppliers' worldwide. It is the role of the purchasing department to oversee and manage these practices.

In order to comply with this commitment, the Contract Approval Policy must be complied with in the engagement and management of all suppliers. In order to comply with the Contract Approval Policy, suppliers will also be required to sign the Supplier Code of Conduct.

HCA has the right to terminate the contract of any supplier who does not comply with the Supplier Code of Conduct. In the event HCA has serious concerns about a supplier in relation to this policy, this may be referred to the Risk Advisory Group who will provide the company with a detailed report on the supplier.

To demonstrate our absolute commitment in this regard we are:

- Developing a corporate strategy for an anti-trafficking policy, which will permeate all activities, including supplier codes of conduct, and clear procedures for reporting any suspected incidences.

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- Contributing to the prevention of human trafficking, through awareness training and engagement of our employees and patients, where practical.
- Developing and sharing best practice.

7.1 Requirements

HCA expects that our Suppliers:

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
- Will ensure that the overall terms of employment are voluntary;
- Will comply with the minimum age requirements prescribed by applicable laws;
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
- Will abide by applicable law concerning working times.

7.2 Certification

Suppliers will be expected to certify that materials incorporated into the products they provide complies with the laws regarding human trafficking and slavery of the country or countries in which they are doing business. All Suppliers will be required to sign a Supplier Agreement to this effect. Signed agreements must be in place before any orders are placed with a Supplier.

7.3 Audits

Suppliers must be able to demonstrate compliance with this policy at the request and satisfaction of HCA.

8 IMPLEMENTATION PROCESS

The Human Resources Team is responsible for the implementation of this policy, along with the Senior Management Teams at the corporate office and within each facility.

The policy will be distributed to the following groups:

Group	Responsibility
Director Human Resources	Accountable for delivery
Director of Purchasing	Accountable for delivery
Corporate Human Resources Team	Review and implementation oversight
Purchasing Team	Review and implementation oversight
Facility Human Resources Team	Implementation

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Facility Materials Team	Information and support of process
Facility Senior Management Team	Information and support of process
Line Managers	Information and support of process
Employees	Information

9 MONITORING

HCA is committed to monitoring Human Trafficking. HCA will monitor for cases of suspected and actual human trafficking using the principles set out in this policy.

10 TRAINING

Training on the policy is delivered through the local HR team and the Purchasing Team

- End Document -