Modern Slavery and Human Trafficking Statement

Introduction

Modern Day Slavery is a violation of a person's human rights and is a global issue and concern for public and private sector services. It can take the form of human trafficking, forced labour, bonded labour, forced or servile marriage, descent-based slavery and domestic slavery.

The Modern Slavery Act 2015 ("the Act") introduced changes in UK law focused upon increasing transparency in supply chains, to ensure commercial supply chains are free from modern slavery. The Health Care Act 2022 introduced new provisions on modern slavery within the NHS to ensure that the NHS is not buying or using goods or services produced by or involving any kind of slave labour.

For organisations that provide services to the NHS through agreed frameworks there is a necessity to meet the requirements of Procurement Policy Note PPN-009, Tackling Modern Slavery in Government Supply Chains.

This statement is made in line with section 54(1) of the Act and sets out the steps that Portland Clinical Ltd. take to prevent modern slavery and human trafficking in our business or supply chain for the financial year ending October 2025.

Our organisation and structure

Portland Clinical Limited provides bespoke Insourcing and Community Healthcare services to NHS Healthcare organisations to assist organisations to increase capacity in the delivery of services across most areas of Great Britain.

The company was founded in 2020, with the registered office located at 28 Bailey Street, Sheffield, S1 4EH.

Our Commitment to Prevent Slavery and Trafficking

Portland Clinical, as a provider of insourcing healthcare services and framework approved supplier, recognises the significant role it must play as part of the wider healthcare community in combatting Modern Slavery.

Portland Clinical Directors, Executive Leadership Team, Clinical and Head Office Teams fully support the Government's objectives to eradicate modern slavery ad human trafficking.

Our Responsibilities

In accordance with the Act, Portland Clinical takes steps to ensure modern slavery is not taking place in any part of its own business or any of its supply chains. We are committed to social and environmental responsibility and have zero tolerance for modern slavery and human trafficking.

All staff, both substantive and those that are deployed at our partner NHS Trust sites, have a personal responsibility to consider issues regarding modern slavery and human trafficking and incorporate their understanding of these into their day-to-day practice. The three main areas relate to:

- Our workforce through recruitment
- Patients that we see and treat (Safeguarding)
- Our supply chain through procurement

Arrangements For Preventing Modern Slavery and Human Trafficking

Modern slavery is incorporated into our Safeguarding Policy. There is a clear line of accountability for safeguarding, with any identified concerns regarding modern slavery and human trafficking being escalated as part of Portland Clinical's Safeguarding processes working in conjunction with both partner NHS Trust sites where insourcing services are provided and also all external partner agency with responsibility for Safeguarding.

The organisations Chief Executive Officer has ultimate responsibility and accountability for ensuring that safeguarding and promoting the welfare of children and adults is discharged effectively across the organisation.

The Director of Governance and Risk is the nominated Safeguarding Lead for the organisation with responsibility for providing leadership and gaining assurance in relation to safeguarding issues withing Portland Clinical. The Director of Governance and Risk is responsible for the development of suitable policies and processes, ensuring appropriate training programmes are in place, and monitoring compliance and quality improvement programmes in relation to safeguarding.

All staff are required to participate in Safeguarding Adults and Children training at level 2 as a minimum, with the organisations lead being required to hold level 3 training. Any emerging locally or nationally identified risks raised by any multiagency partners will be included in risk register collation, workforce training plans and policy and process reviews.

All safeguarding activity is reviewed by the organisations Quality Review Committee and the Governance Group. Outcomes of these are presented to the Board of Directors.

Our Workforce

Portland Clinical's recruitment and compliance policies and procedures ensure all employment checks are in line with national Human Resources and NHS employment check standards. These checks include, identification, right to work, confirmation of qualifications and employment history, professional registration, Disclosure and Barring Service and reference checks.

Any staff involved in the procurement of services for Portland Clinical are encouraged to undertake additional training related to ethical procurement and social values.

This assists our team with the following when conducting any commercial activity:

- Identify modern slavery risks
- Manage risks effectively in supply chains and existing contracts
- Assist the organisation to act if victims of modern slavery are identified

Our Supply Chain

As a key principle of all procurement activity, steps are taken to identify, prevent and mitigate modern slavery in its contractual service provision and supply chains. Consideration is made to PPN 009- Tackling Modern Slavery in Government Supply Chains.

Included within Portland Clinical's procurement process is a mandatory exclusion question regarding compliance with Section 54 of the Modern Slavery Act 2015. The organisation also applies appropriate and proportionate quality criteria to ensure true value is obtained, reducing the risk of price focused competition. This may include details of suppliers' working practices, policies and procedures.

Our supply chain includes marketing, IT, utilities, subsistence and accommodation, travel, consulting and professional services.

We procure our goods and services from a rigorously selected group of predominantly domestic suppliers. We do not simply buy goods or services solely on the basis of cost.

We expect and take all reasonable and practical steps to require all strategic suppliers in our supply chain to adhere to our values and policies. We assess and categorise suppliers taking into account the type and nature of their business in the context of the goods or services supplied as well as country of operation and industry characteristics.

Suppliers categorised as presenting a significant risk of modern slavery or trafficking are subject to additional due diligence, primarily including checks of their own modern slavery and human trafficking statements where applicable, and any other published policies and procedures.

If, following additional due diligence and checks, a supplier is still assessed as presenting a significant risk of modern slavery or failing to meet our standards, they are required to complete a modern slavery questionnaire in order to enable us to further assess the risks of the presence of modern slavery within the particular supplier's organisation.

Non-compliance

If Portland Clinical find a supplier is non-compliant with our policies or contractual requirements relating to anti-slavery or provides inadequate information, we will, depending on the circumstances, either terminate the arrangement without delay, or work with the relevant supplier to improve their performance.

Based on our supply chain due diligence and review during the course of the 2023-2024 financial year ending 31st October 2024, we are satisfied that our key suppliers have appropriate anti-slavery policies in place.

Associated Supporting Policies and Guidance

- Portland Clinical Governance Handbook
- Recruitment Policy
- Safeguarding Adults and Children Policy
- Compliance Handbook & SOP
- Freedom To Speak Up Policy
- Anti-Slavery and Human Trafficking Policy
- Incident and Event Reporting Policy
- Equality and Diversity Policy

Embedding the Principles of the Act

Over the past three years, we have taken the following steps to ensure compliance with the Act:

- Introduced modern slavery training for employees and made them aware of appropriate action to take if they suspect an instance of slavery or human trafficking.
- Ensured that modern slavery risks and compliance are key considerations for Portland Clinical as an employer, provider of and procurer of goods and services.
- Updated our contractual terms and conditions to reference the Act and to include a specific requirement for suppliers to comply with the Act.

- Delivered targeted training sessions to staff procuring goods and services.
- Reviewed and evaluated the risks of modern slavery in our supply chain.

In terms of ongoing compliance, this year Portland Clinical will undertake the following activities:

- Continue to develop awareness of the Act amongst its people and ensure awareness of reporting mechanisms if an instance of modern slavery or human trafficking is suspected.
- Develop measures including a specific anti-slavery policy to evidence our commitment to the principles of the Act.
- Continue to review and strengthen our procurement processes and policy, taking into account a range of risks, including slavery and human trafficking.

Commitment

Portland Clinical remains committed to ensuring that modern slavery is not taking place within its own business or any of its supply chains.

The Board of Directors has considered and approved this statement and will continue to meet the requirements of the legislation.

Signed on behalf of the Board of Directors by



Ian Yuill- Chief Executive Officer

01 November 2025