

# DELT SHARED SERVICES

## MODERN SLAVERY STATEMENT

### Introduction

Human trafficking and modern slavery have no place in our society. As a company Delt is fully committed to taking all practical steps to ensure that such practices can find no hiding place in our organisation. Whilst we are currently below the revenue threshold for the mandatory production of a Modern Slavery Statement we have elected to do so on a voluntary basis. We believe the localised nature of our activities and our customers, contractors and supplier geography, puts us at lower risk than some in the shared service industry. Nevertheless, we remain vigilant in the detection and prevention of modern slavery and human trafficking. We are committed to our company values of transparency and integrity and publish this statement to outline the procedures Delt already undertakes, along those it intends to develop, to prevent illegal activity occurring within our business supply chains. This is Delt's first annual Modern Slavery Statement and has been developed in accordance with the Modern Slavery Act 2015. It is owned by the Delt Board and was approved on 19 August 2019 but is expected to be further refined and developed on an ongoing basis.

### Our Business

Delt is a shared service provider and back office support services company that is wholly owned by the public sector. We are a proudly local organisation, with more than 100 doctors' practices, children's social care and over 300 other critical services being delivered by our clients to around 900,000 people across the South West. We pay over 10,000 people each month from 32 organisations. Delt works quietly behind the scenes, running technology and other back office services to help our clients and partners.

### Our People

Delt are an accredited "Living Wage" employer in the UK and we are committed to ensuring all staff are paid at least the national living wage (higher in most cases) as well as generous benefits such as pension contributions and enhanced annual leave allowance. Our HR team review and maintain a fair reward system for all staff. Where viable, we extend our

commitment to pay at least the national living wage to contractors and third-party suppliers. This is just one of the steps we take to ensure the abuse of people does not take place anywhere within our business, or our supply chains.

## Risk Assessment and Due Diligence

Where our supply chain opportunities are of a certain value or risk, we conduct an initial suitability assessment. For requirements over the EU threshold potential suppliers are asked questions required under Regulation 57 of the Public Contract Regulation 2015 enabling us to identify any previous convictions of misconduct or mistreatment of staff through their activities. This determines whether a supplier is progressed onto subsequent stages of the procurement process. Our Procurement and HR teams are currently developing a series of core questions around Equality & Diversity, Social Value, Health and Safety and Safeguarding, relevant to all procurement opportunities which will be fully implemented by the end of 2019. Tailored questions may be used in industries that are considered a high risk of modern slavery. Upon return of tenders, our Procurement and HR teams work collaboratively to determine whether organisations are ethically and legally sound and suitable suppliers for Delt. Delt also undertake regular Audits, which are carried out by both independent auditors and internally. Where an issue is identified during the Audit, the supplier will be expected to work with our teams to prepare a corrective action plan and resolve everything that has been highlighted within an agreed time period. As well as a companywide Risk Register, the Procurement team hold a commercial Risk Register which enables us to monitor incidents and the behaviours of our supply chain to ensure that they meet our values and expectations.

## Future Plans

Outside of the tendering process, once a contract is awarded, we take our ongoing responsibility seriously to ensure modern slavery is not present within either a supplier organisation or within their supply chain. Regular contract reviews take place that give both the supplier and Delt the opportunity to evidence what is being done within their organisations to ensure that it is prevented. By December 2019 Delt will have developed a new Supplier Relationship Management Policy, which will include how we determine risks associated with suppliers (e.g. where their manufacturing is conducted) and what actions will need to be undertaken. As our business grows, naturally our supply chains will too. We are committed to constant re-evaluation of our processes and how we identify and manage areas of risk. One of our steps to ensuring this happens, is to invest in high quality training for our Procurement team and other key staff across the organisation who are responsible for, and involved in, supplier and contractor activities. The Procurement team is made up of professionally qualified individuals who regularly undertake refresher training to ensure that they are aware of changes to legislation and policy, to meet the standard expected not only from their professional body but from Delt itself. Increased awareness of modern slavery risks; poor working conditions, low wages, sexual harassment, discrimination, unstable employment and child exploitation, are all areas we need to grow and develop our

shared understanding of, not only internally at Delt but with our partners and customers too.

A handwritten signature in black ink, appearing to read 'Giles Letheren'.

Giles Letheren  
Chief Executive Officer

September 2019