MODERN SLAVERY ACT 2015 – ANNUAL STATEMENT 2018/19

INTRODUCTION

This Statement is made pursuant to s54 of the Modern Slavery Act 2015 and sets out the steps that Nottinghamshire Healthcare NHS Foundation Trust (the Trust) has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Trust has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

AIM OF THIS STATEMENT

The aim of this statement is to demonstrate that the Trust follows good practice and all reasonable steps are taken to prevent slavery and human trafficking.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking, with the Procurement Department taking lead responsibility for compliance in the supply chain.

ABOUT THE ORGANISATION

The Trust is a major provider of mental health, intellectual disability and community healthcare services for the people of Nottinghamshire, seeing about 190,000 people every year.

Our 9000 staff carry out a wide range of roles, working together to provide integrated and coordinated care and support to those using our services. Some of our patient-facing staff include the following:

mental health nurses
psychiatrists
social workers
healthcare support workers
health visitors
school nurses
allied health professionals (including occupational therapists, and speech and language therapists)
psychologists
district nurses
community nurses
learning disability nurses
physical healthcare nurses
We have an annual budget/income of over £400 million. With that we provide services across the county for people with mental health needs, with needs relating to drug or alcohol dependency, mental and physical health services for people with intellectual disabilities and community physical healthcare. We also provide secure mental health services.

**OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

The Trust is aware of its responsibilities towards patients, service users, employees and the local community and expects all suppliers to the Trust to adhere to the same ethical principles. The Trust is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships.

Currently all awarded suppliers sign up to our terms and conditions of contract which contain a provision around Good Industry Practice to ensure each supplier’s commitment to anti-slavery and human trafficking in their supply chains; and that they conduct their businesses in a manner that is consistent with the Trust’s anti-slavery policy.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include the following:

**Recruitment policy:** We operate a robust recruitment policy including conducting eligibility to work in the UK checks for all directly employed staff. External agencies are sourced through the NHS Improvement nationally approved frameworks and are audited to provide assurance that pre-employment clearance has been obtained for agency staff to safeguard against human trafficking or individuals being forced to work against their will.

**Equal Opportunities:** We have a range of controls to protect staff from poor treatment and/or exploitation which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.

**Safeguarding Policies:** We adhere to the principles inherent within both our Safeguarding Children and Adults at Risk policies. These provide clear guidance so that our employees are aware as to how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.

**Raising Concerns (Whistleblowing) Policy:** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.

**Standards of Business Conduct and Behaviour Policy:** This policy explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
Employment Policy (Incorporating Employing People with Disabilities, Employment Status, Employment Check Standards and Relocation): This policy explains our vetting and barring procedures, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking, or individuals being forced to work against their will. The Trust adheres to the National NHS Employment Checks/Standards including employee’s UK address, their right to work in the UK and obtaining suitable references.

WORKING WITH SUPPLIERS

In compliance with the consolidation of offences relating to trafficking and slavery within the Modern Slavery Act 2015, the Procurement Team continuously reviews its supply chains with a view to confirming that such actions are not taking place.

The 2018 review of the Trust’s Non Pay spend and associated supply chains identified the following general potential areas of risk as Provision of Food, Construction, Cleaning & Clothing (work wear).

All existing suppliers in these categories have been written to confirm compliance with the Act and provide additional information on their organisation, their supply chains, the areas of risk & the due diligence undertaken.

In addition, the Procurement Team ensures that due diligence is undertaken for all new and ongoing suppliers of goods and services to the organisation and their associated Supply Chains by sourcing through the following compliant routes:

1. Competitive OJEU (Official Journal of the European Union) procurements tendered in compliance with EU guidance which require suppliers to confirm they comply with the Modern slavery act. To support their response bidders are also required to state:
   a. the organisation’s structure, its business and its supply chains;
   b. its policies in relation to slavery and human trafficking;
   c. its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
   d. the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
   e. its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
   f. the training and capacity building about slavery and human trafficking available to its staff.

2. Procurement through EU compliant national government frameworks.

3. All contracts and associated purchase orders are raised on the NHS Standard Terms and Conditions which suppliers are mandated to comply with. These conditions state:
10.1.28 it shall: (i) comply with all relevant Law and Guidance and shall use Good Industry Practice to ensure that there is no slavery or human trafficking in its supply chains; and (ii) notify the Authority immediately if it becomes aware of any actual or suspected incidents of slavery or human trafficking in its supply chains;

10.1.29 it shall at all times conduct its business in a manner that is consistent with any anti-slavery Policy of the Authority and shall provide to the Authority any reports or other information that the Authority may request as evidence of the Supplier’s compliance with this Clause 10.1.29 and/or as may be requested or otherwise required by the Authority in accordance with its anti-slavery Policy.

The Procurement Team upholds the Chartered Institute of Procurement and Supply (CIPS) Code of Professional Conduct.

TRAINING

Advice and training about Modern Slavery and human trafficking is available to staff through our mandatory Safeguarding Children and Adults training programmes, our Safeguarding policies and procedures, and our Safeguarding Leads. It is also discussed at our compulsory staff induction training.

Awareness is also raised through information sharing on the Trust intranet and our public website.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

• No reports are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

BOARD OF DIRECTORS' APPROVAL

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

Signed on behalf of the Board of Directors:

Dean Fathers
Chair

Ruth Hawkins
Chief Executive

31 May 2018