

# **Modern Slavery and Human Trafficking Act 2015 Statement**

## **Organisational structure and purpose**

Our Trust is made up of 5 of the UK's best-known hospitals – Guy's, St Thomas', Evelina London Children's Hospital, Royal Brompton and Harefield hospitals. The Trust employs over 23,500 staff and has an annual turnover of over £2.6 billion.

The Trust provides a full range of hospital and community services for our local communities in Lambeth and Southwark, as well as specialist services for patients from further afield, including cancer, cardiovascular, women's and children's services, kidney care and orthopaedics. St Thomas' has one of the busiest emergency departments in London. Royal Brompton and Harefield hospitals provide specialist heart and lung services to patients from across the country.

## **Organisational policies in relation to modern slavery and human trafficking**

The Trust has internal policies and procedures in place that assess, identify and respond to any concerns in relation to the potential for modern slavery or human trafficking. The Trust Safeguarding Standard procedure includes information on modern day slavery/human trafficking with clear guidelines on how to identify, ensure patient safety and escalate using the agreed processes. The procedures states that staff should report incidents of all types and this includes concerns regarding modern slavery and human trafficking via the safeguarding route.

All staff have access to the trust Safeguarding Adults Service for support and guidance when they are concerned about modern day slavery or trafficking. The Trust has a Freedom to Speak Up – Raising a matter of concern policy which details how staff can raise any concerns that they may have confidentially. This can be through a Freedom to Speak Up email inbox, or through a conversation with the Freedom to Speak Up Guardian, who will provide support to the individual raising a concern. Staff are provided with this information at corporate induction.

## **Current initiatives**

The Trust fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role the NHS has to play in both combatting it and supporting victims. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses. Steps taken to date include:

## **Procurement and our supply chain**

- Our procurement approach follows the Cabinet Office Procurement Policy Note 05/19: Tackling Modern Slavery in Government Supply Chains:

- Pre-procurement and Specification: Identify the risk of modern slavery to the contract to establish if modern slavery can be factored into the specification, ensuring that this does not create a burden for SMEs/VCSEs.
- Selection Stage: Consider the mandatory and discretionary exclusion grounds as set out in the Standard Selection Questionnaire.
- Award Stage: Apply tender response questions relating to modern slavery where they link to the specification, taking a proportionate approach.
- Contract Conditions: Apply NHS Standard Terms and Conditions which require suppliers to comply with relevant legislation.
- Contract management: Following contract award, continually work in collaboration with suppliers to address modern slavery risks. The safeguarding teams for children and adults oversee all new contract agreements to ensure that the safeguarding requirements as per the NHS Standard Contract are met.

### **Staffing clinical and non-clinical**

- We continue to support all Trust staff to understand and respond to modern slavery and human trafficking, and the impact that each, and every individual working in the NHS can have in keeping present and potential future victims of modern slavery and human trafficking safe.
- We ensure that all Trust staff have access to training, provided on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information and will help staff develop the skills to support individuals who come into contact with health services
- We ensure the safeguarding procedures document includes up to date information on modern slavery and human trafficking.
- We identify which contracts are at high or medium risk of modern slavery based on industry type, complexity of supply chain, the nature of the workforce, context in which the supplier operates, type of commodity and supplier location. Work with the suppliers on high and medium risk contracts to mitigate the risks through contract management.

### **The Trust reviews its Modern Slavery and Human Trafficking Statement on an annual basis and presents it at the Board of Directors.**

To identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain:

- The Trust adheres to the National NHS Employment Checks / Standards (this includes employees UK address, right to work in the UK and suitable references)
- The Trust has systems to encourage the reporting of concerns and the protection of whistleblowers

- The Trust purchases a significant number of goods and services through NHS Supply Chain and the Crown Commercial Service, who's 'Supplier Codes of Conduct' includes a provision around forced labour.
- Other contracts are governed by standard NHS Terms & Conditions in which suppliers warrant that there is no slavery or human trafficking in its supply chains and they must notify the Trust if they become aware of any actual or suspected incidents of slavery or human trafficking in its supply chains.
- The Trust request all suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through agreement of our 'Supplier Code of Conduct', purchase orders and tender specifications. All of which will set out our commitment to confirming there is no modern slavery or human trafficking related to Trust service provision.
- The Trust upholds professional codes of conduct and practice relating to procurement with the procurement sourcing staff required to be members of the Chartered Institute of Purchasing and Supply (CIPS) and MCIPS qualified.

### **Effective action taken to address modern slavery - Performance Indicators**

The Trust is committed to the protection of vulnerable people and has zero tolerance for Modern Slavery and Human Trafficking. Any identified concerns regarding Modern Slavery and Human Trafficking are escalated as part of the organisational safeguarding process. All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the procurement department taking responsibility for overall compliance.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to Guy's and St. Thomas' NHS Foundation Trust.

December 2021