

## Modern Day Slavery Act 2015 - Annual Statement 2018/2019

### **INTRODUCTION**

This statement is made pursuant to s54 of the Modern Slavery Act 2015 and sets out the steps that Sherwood Forest Hospitals NHS Foundation 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. Sherwood Forest Hospitals 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 safeguarding 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 Sherwood Forest Hospitals follows good practice and all reasonable steps are taken to prevent slavery and human trafficking within our business or supply chain.

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

### **ABOUT THE ORGANISATION**

Sherwood Forest Hospitals is a major provider of acute hospital services for 420,000 people across Mansfield, Ashfield, Newark, Sherwood and parts of Derbyshire and Lincolnshire.

We employ more than 4,500 staff across Kings Mill, Newark and Mansfield Community Hospitals and we also run some services from Ashfield Community Health Village. We also have 700 volunteers working across all of our sites.

We have an annual budget of £304.7 million with operating expenses of £313.4 million. We work closely with partner organisations that provide regulatory and support services to health and social care systems. We are a committed member of the Nottinghamshire and Nottinghamshire Sustainability and Transformation Partnership (STP), which is now moving to an Integrated Care System (ICS).

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Sherwood Forest Hospitals is aware of its responsibilities towards patients, carers, employees and the local community and expects all suppliers to Sherwood Forest Hospitals to adhere to the same ethical principles. Our supply chain includes procurement of agency staff, medical services, medical and other consumables, facilities maintenance, utilities and waste management. We are 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 provide provision to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chain; and that they conduct their business in a manner that is consistent with Sherwood Forest Hospitals policies.

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

**Recruitment policy.** We operate a robust recruitment policy and under due diligence to identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain we:

Complete pre-employment checks on staff we employ, confirming their identities and right to work in the United Kingdom.

Ensure agencies are on NHS improvement nationally approved frameworks and are audited to provide assurance that pre-employment clearance has been obtained for agency staff to safeguarding against human trafficking or individuals being forced to work against their will.

Follow NHS Agenda for Change Terms and Conditions to ensure that staff receive fair pay rates and contractual terms.

Consult with Trade Unions on any proposed changes to employment terms and conditions.

**Equal Opportunities:** We have a wide range of controls to protect staff from poor treatment and/or exploitation, which complies with legal and regulatory frameworks. These include terms and conditions of employment, access to training and development.

**Safeguarding Policies:** We adhere to the principles inherent in our Think Family Safeguarding Adult and Safeguarding Children policies. These are compliant with Nottinghamshire multiagency arrangements and provide clear guidance to support our staff in 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 whistle blowing policy to support all employees to be able know that they can raise a concern about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisal

**Employment policies (including Policy and Procedure for Disclosure and Barring Service (DBS) Checks, Employment Records & Information Policy and Procedures, Professional Registration Policy, Induction Policy).** These policies explain our vetting and barring procedures, including conducting eligibility to work in the UK checks for all employees to safeguarding 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

Sherwood Forest Hospitals will work to identify and mitigate risk and put in place contractual terms which will allow the Trust to gain assurance that slavery and human trafficking have no place in our business. Sherwood Forest Hospitals will work with suppliers to ensure that they treat their obligations towards modern slavery with the same importance that we do.

Suppliers are vetted through a robust Selection Questionnaire process prior to being appointed to any framework agreement

All contracts are awarded under the NHS Terms and Conditions which contain clauses giving Sherwood Forest Hospitals the right to terminate a contract for failure to comply with labour laws.

When procuring goods and services, we additionally apply NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with relevant legislation.

The staff of Sherwood Forest Hospitals must contact and work with the Procurement department when looking to work with new suppliers so appropriate checks can be undertaken.

Where it is verified that a subcontractor has breached child labour laws or human trafficking, then this subcontractor will be excluded in accordance with Regulation 57 of the Public Contracts Regulation 2015. The Trust will require that the main contractor substitute a new subcontractor

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 adults and children training programmes, our Safeguarding policies and procedures, and our safeguarding team. It is also discussed at our mandatory safeguarding induction day for staff commencing employment with Sherwood Forest Hospitals. It also forms part of the training for our safeguarding champion network.

We are continuously looking at ways to increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

## **OUR PERFORMANCE INDICATORS**

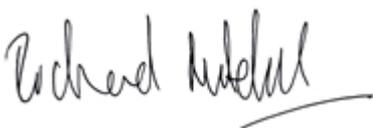
We will know the effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices are operational within our organisation

## **QUALITY COMMITTEE APPROVAL**

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

**Signed on behalf of the Quality Committee:**



**Chief Executive**



**Chief Nurse and Executive Lead for Safeguarding**

**21<sup>st</sup> November 2018**