

## **Modern Slavery and Human Trafficking Act 2015 Annual Statement 2018/19**

The Modern Slavery Act 2015 is designed to consolidate various offences relating to human trafficking and slavery. The provisions in the Act create a requirement for an annual statement to be prepared that demonstrates transparency in supply chains. In line with all businesses with a turnover greater than £36 million per annum, the NHS is also obliged to comply with the Act.

### **Summary**

The legislation addresses slavery, servitude, forced or compulsory labour and human trafficking, and links to the transparency of supply chains.

Section 54 of the Act specifically addresses the point about transparency in the supply chains. It states that a commercial organisation (defined as a supplier of goods or services with a total turnover of not less than £36 million per year) shall prepare an annual written slavery and human trafficking statement for the financial year. The statement should include the steps an organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of the supply chain or its business. The statement must be approved by the Board of Directors (or equivalent management body) and published on the Trust's website.

The aim of the statement is to encourage transparency within organisations, although it is possible to comply with the provision by simply stating that no steps have been taken during the financial year to ensure that the business and supply chain is modern slavery free. There are potential consequences for those organisations that do not appear to make progress in this area; especially for those that are funded wholly, or in part, by public money. On this basis, it is worth noting that although this may be an acceptable approach, there is an expectation that work will be undertaken to provide assurances in this regard.

### **Modern Slavery and Human Trafficking Act 2015 Annual Statement 2018/19**

Section 54 of the Modern Slavery Act 2015 requires all organisations to set out the steps it has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

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 responsibility lead for overall compliance.

As an authorised statutory body, City Hospitals Sunderland NHS Foundation Trust provides a range of NHS services across Gateshead, South Tyneside and Sunderland. Services are provided in hospital, in the community and in patients' homes, covering a population in excess of 350,000 residents along with an increasing range of more specialised services provided to patients outside the area, in some cases to a population as great as 860,000. The Trust also provides a substantial range of community based services, particularly within Family Care and Therapy Services. The Trust has around 811 acute beds. It employs around 5,140 people.

Our internal recruitment processes are mature and adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records. Our pay structure is derived from national collective agreements and is based on equal pay principles with rates of pay that are nationally determined.

The top 80% of suppliers nationally, affirm their own compliance with the Modern Slavery and Human Trafficking Act within their own organisation, sub-contracting arrangements and supply chain. Receiving assurance regarding supplier risk in relation to the potential for modern slavery or human trafficking is an integral part of the NHS Terms and Conditions for the Provision of Goods and Services. All suppliers are asked to inform the Trust immediately if there are any indications of incidents relating to, or the potential for, Modern Slavery and Human Trafficking.

The Head of Procurement is Chartered Institute of Purchasing and Supply (CIPS) qualified and abides by the CIPs Code of Professional Conduct. All members of the Procurement Team comply with the relevant training requirements and abide by the CIPS Code of Ethics.

In 2018/19, information on modern slavery and human trafficking will be shared through the Trust's internal communications methods. Human Trafficking training is also delivered as part of the Level 3 Safeguarding Training. The Trust has evaluated the principle risks related to slavery and human trafficking as:

- Lack of assurances from suppliers
- Lack of appropriate clauses in contracts
- Reputational damage