

MODERN SLAVERY AND HUMAN TRAFFICKING ACT 2015

ANNUAL STATEMENT FOR FINANCIAL YEAR ENDED 31 03 22

This statement has been published in accordance with the requirements of Section 54 (1) Modern Slavery Act 2015 (the Act). It sets out the steps taken by South Tyneside and Sunderland NHS Foundation Trust during the financial year ended 31 March 2022 to ensure modern slavery and human trafficking is not taking place in any part of our business or any of our supply chains.

South Tyneside and Sunderland NHS Foundation Trust has a zero tolerance approach to modern slavery of any kind within our organisation and supply chains. We are committed to improving our practices to enable us to ensure slavery and human trafficking is not taking place in any of our supply chains, and in any part of our own business.

About the Trust

South Tyneside and Sunderland NHS Foundation Trust provides acute and community healthcare services to a core population of over 430,000 people living in and around the borough of South Tyneside and the City of Sunderland, as well as thousands of people from Durham who regularly use our services. We also provide a number of community and other services to the Gateshead population as well as a range of specialist services accessed by patients across the whole of the North East and beyond, serving a population of almost 1 million people.

As at the end of March 2021, the Trust employed 8,318 members of staff, has over 1,000 acute beds, an annual income of £681.886m and fixed assets of £49.281m.

Our vision is “*to deliver nationally recognised, high quality, cost effective, sustainable healthcare for the people we service, with staff who are proud to recommend our services.*” This is supported by the organisation’s values:

- compassionate and dignified, high quality, safe patient care always the first priority;
- working together for the benefit of our patients and their families or carers;
- openness and honesty in everything we do;
- respect and encouragement for our staff; and
- continuous improvement through research and innovation.

Staff Training

The Trust recognises we have a responsibility to take a robust approach to preventing and addressing any concerns to slavery and human trafficking.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking.

Training on slavery and human trafficking training is delivered as part of Safeguarding Training (all levels) which all members of staff are required to undertake. Refresher training is required no more than every 3 years (frequency differs depending on the level of training required for individual roles).

Policies and Initiatives

The Trust has a number of policies which support our commitment to preventing modern slavery and human trafficking as well as providing a framework for staff to identify and raise concerns where necessary. These policies are reviewed regularly:

- **Recruitment**
 - Criminal Background/DBS Checks Policy
 - Employment Checks Policy
 - Equality, Diversity and Inclusion Policy
 - Locum Doctor and Other Agency Worker Policy
 - Recruitment and Selection Policy
- **Raising Concerns**
 - Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy
 - Incident Reporting Policy
 - Investigating and Learning from Incidents Policy
 - Standards of Business Conduct Policy
- **Safeguarding**
 - Safeguarding Adults and Mental Capacity Act and Deprivation of Liberty Safeguards Policy
 - Safeguarding and Looked After Children Policy
 - Safeguarding Supervision for Healthcare Professionals Policy

In addition, the Trust's wholly-owned subsidiary, CHoICE, has its own policies and procedures for staff similar to those listed above, including a Control of Contractor's Policy.

Procurement and our 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. Suppliers are assessed on their social responsibility, including modern slavery and other ethical standards approaches, before tenders are evaluated. When undertaking procurement of services and goods prospective suppliers are assessed to ensure:

- they comply with all relevant law and guidance and use good industry practice to ensure there is no slavery or human trafficking in its supply chains; and
- they shall notify the Trust immediately they become aware of any actual or suspected incidents of slavery or human trafficking in its supply chains.

Due Diligence and Supplier Compliance

The Procurement function of the organisation is delivered by City Hospitals Independent Commercial Enterprises Ltd (CHoICE), a wholly-owned subsidiary of the Trust. CHoICE has published a separate [statement](#) setting out its commitment to prevent modern slavery and human trafficking in its operations and supply chain. In addition, the national NHS Supply Chain expects

all companies doing business with it to adhere to strict ethical principles. For this purpose, NHS Supply Chain has drawn up a [supplier code of conduct](#) and any breach of the obligations stipulated in this supplier code of conduct is considered a material breach of contract by the supplier.

The Procurement team makes use of the national NHS Supply Chain's Modern Slavery Assessment Programme. In addition NHS Supply Chain has developed an online Modern Slavery Assessment Tool for use by suppliers. The tool is a risk identification and management tool that will help providers, in partnership with suppliers, reduce the risk of exploitation of workers in supply chains and help drive improvements.

The Trust's risk management process is used to ensure risks are identified and mitigated with appropriate controls. Concerns raised through any route (eg incident report, Freedom to Speak Up/Whistleblowing concern, safeguarding concern or line manager) are investigated.

In 2021/22, the Trust's internal auditors (AuditOne) undertook a compliance review in regard to the Trust's Modern Slavery Act Statement and a good level of assurance was given.

Priorities for 2022/23

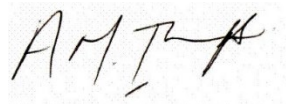
During 2022/23 the Trust will take forward the recommendations arising from the internal audit review of compliance with the Trust's Modern Slavery Statement, including:

- a redesigned procurement cycle which will strengthen the assurances of suppliers in respect of compliance with the Modern Slavery Act;
- requirement that CHoICE ensure relevant procurement staff have received training on the Modern Slavery Act; and
- consideration of further training on modern slavery as part of the right to work/ID check training provided to recruitment services team.

In addition, new guidelines have been published (June 2022) by the Royal College of Paediatric and Child Health which include a number of good practice recommendations. This guidance and these recommendations will be considered by the Safeguarding Children Team and included in relevant training packages.

Approval of this Statement

The statement was endorsed at Governance Committee on 29 June 2022 and endorsed by the Board of Directors on 28 July 2022.



ALLISON THOMPSON
Chair



KEN BREMNER MBE
Chief Executive