

MODERN SLAVERY AND HUMAN TRAFFICKING ACT 2015

ANNUAL STATEMENT FOR FINANCIAL YEAR ENDED 31 MARCH 2023

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 2023 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. 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 2023, the Trust employed 8,674 members of staff, has just over 1,000 acute beds, an annual income of £730.761m and fixed assets of £250.961m.

Our vision is deliver “excellence in all that we do” and how we do this is set out in our 5 year strategic framework. Both our vision and strategic framework are supported by the organisation’s values:

- Compassion – we are kind and caring;
- Honesty – we are open and honest;
- Respect – we treat people fairly and with respect; and
- Teamwork – we work as a team.

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).

The Trust's recruitment team have undertaken additional training in respect of modern slavery.

Members of the Procurement team undertake additional training provided by the London Universities Purchasing Consortium as follows:

Topic 1: Introduction: Protecting Human Rights in the Supply Chain: A Guide for Public Procurement Practitioners (to be completed by all procurement staff, including managers and Head of Procurement).

Topic 2. Assessing and Prioritising Risks (to be completed by all managers and Head of Procurement).

Topic 3. Monitoring and Responding (to be completed by all managers and Head of Procurement).

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
- **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, and the vast majority of procurement for goods and services is undertaken by this route. 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. Documentation has been improved in relation to any local open tender procurement exercises and Modern Slavery Act is included in the Capacity and Capability tender document. NHS Supply Chain's commitment to tackling modern slavery is available on its [website](#).

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 concerns, safeguarding concern or line manager) are investigated.

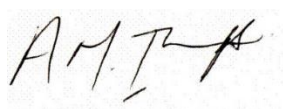
In 2021/22, the Trust's internal auditors (AuditOne) undertook a compliance review in regard to the Trust's Modern Slavery Act Statement and a good level of assurance was given. Progress against the agreed recommendations from that Audit have been monitored by the Trust's Audit Committee and all actions have been completed in 2022/23.

Priorities for 2023/24

During 2023/24 the Trust will continue to work with partner organisations to identify any risks around modern slavery and will continue to engage in webinars and further training as they become available.

Approval of this Statement

The statement was approved at Governance Committee on 28 June 2023 and endorsed by the Board of Directors on 27 July 2023.



ALLISON THOMPSON
Chair



KEN BREMNER MBE
Chief Executive