

Modern Slavery and Human Trafficking Act 2015 - Annual Statement 2022/23

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Northumbria Healthcare NHS Foundation Trust and its subsidiaries Northumbria Healthcare Facilities Management Ltd and Northumbria Primary Care Ltd. have taken to make sure that modern slavery or human trafficking did not take place within our business or supply chain during the year ending 31st March 2023.

Modern slavery encompasses slavery, servitude, human trafficking and the [International Labour Organisation's \(ILO\)](#) definitions of eleven markers of forced labour.

Northumbria Healthcare has a zero-tolerance approach to any form of modern slavery and human trafficking. The Trust is committed to acting ethically and with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within its business or supply chains, including the expectation that staff and suppliers will comply with the legislation and report any concerns where they may have them.

About the Organisation

Northumbria Healthcare NHS Foundation Trust is a not-for-profit public benefit corporation, part of the National Health Service in England, and provides health and social care for over half a million people in the northeast of England. Delivered in specialised facilities, community hospitals, health centres, GP surgeries and in patients' homes the Trust provides hospital and community health services in North Tyneside and hospital, community health and adult social care services in Northumberland, working closely with a number of partners including commissioners, local councils, NHS England and education organisations. With a workforce of over 12,000 the Trust is one of the region's largest employers, and has an annual turnover in excess of £700 million. More information about what we do can be found on [our website](#).

The Trust has two wholly-owned subsidiaries, Northumbria Healthcare Facilities Management Ltd (established 2012) which delivers 'hard' and 'soft' facilities management services and capital projects to the Trust's sites, and Northumbria Primary Care Ltd. (established 2015), a not-for-profit at-scale provider of primary care services to more than 50,000 people in Northumberland and North Tyneside.

The Trust has extensive, complex supply chains including goods and logistics procured via NHS Supply Chain and goods, services and works procured via frameworks and direct suppliers based in the UK and overseas and recognises that abuses may occur throughout. Goods are sourced from all over the world through the supply chain, including high-risk countries where forms of modern slavery and labour abuses are present. Work is underway to map the supply chain and assess the level of risk relating to this.

Our Policies on Slavery and Human Trafficking

Northumbria Healthcare NHS Foundation 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. The Trust is also aware of its

responsibilities towards patients, service users, employees and the local community and we operate a number of complementary internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Procurement Policy:** This policy outlines the procurement procedures and guidelines to be followed when procuring goods, services or works for the Trust or its subsidiaries.
2. **NHS Supply Chain Supplier Code of Conduct:** NHS Supply Chain delivers an end-to-end logistics and supply service to the NHS in England, and forms a large part of The Trust's supply chain. We expect suppliers to adhere to this Supplier Code of Conduct, which sets a strict set of ethical values and standards to guide suppliers doing business with us.
3. **Standards of Business Conduct and Conflicts of Interest Policy:** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
4. **Safeguarding Adults Policy and Safeguarding and Promoting the Welfare of Children and Young People Policy:** We adhere to the principles inherent within our safeguarding children and adults' policies. These provide clear guidance so that our employees are clear on how to raise safeguarding concerns about patients and visitors.
5. **Complaints Policy and Procedure for Raising Concerns:** We operate a whistle-blowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, without fear of reprisals.
6. **Recruitment and Selection Policy:** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly-employed staff, and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will.
7. **Equality, Diversity and Human Rights Policy:** We have a range of controls to protect staff from poor treatment and/or exploitation, which complies with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.

Due Diligence

The Trust expects its suppliers to adhere to our principles and this includes being strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

As of 1st April 2022, the Trust adopted central government's [Social Value Model](#) which supports Procurement Policy Note PPN 06/20: Taking Account of Social Value in the Award of Central Government Contracts (September 2020), which requires a minimum 10% weighting dedicated to Net Zero and Social Value in procurements, including the elimination of Modern Slavery. The Trust considers the likely impact of and any associated criteria with regard to social issues within its supply chain prior to the commencement of a procurement process carried out by the Procurement CSR & Policy Specialist through its Sustainability Impact Assessment and Social Value Tools.

As of 1st April 2023 the Trust has adopted the guidance [Procurement Policy Note PPN 02/23: Tackling Modern Slavery in Government Supply Chains](#) (February 2023) which sets out how NHS bodies must take action to identify and manage risks in both new procurement activity

and existing contracts, and implemented the requirements of [Procurement Policy Note PPN 03/23 Standard Selection Questionnaire](#) (April 2023), which includes the requirement for supplier disclosure of any offence under the Mandatory Exclusion Grounds and also requires confirmation of compliance with reporting requirements under Section 54 of the Modern Slavery Act 2015.

The Trust uses standard NHS and framework Terms and Conditions and other contract forms which require compliance from our suppliers with relevant legislation and allow the option to terminate for breaches of social and labour laws should they be discovered.

Areas of Risk in the Supply Chain

NHS Supply Chain's (NHSSC) impact is global and its modern slavery and labour standards approach is therefore very important, reflected in its due diligence when appointing suppliers. NHSSC is in the process of mapping its global supply chains down to the category level to identify any risks posed to labour or environmental standards and is working with NHS England on the pilot of the Evergreen assessment, the mechanism for suppliers to engage with the NHS on the requirements of its Net Zero Supplier Roadmap.

The Trust accesses suppliers' services via procurement frameworks which appoint with proper due diligence reputable and reliable firms, ensuring pricing reflects appropriate employment conditions.

The Trust appoints directly, with proper due diligence, reputable and reliable firms with pricing that reflects fair employment conditions.

Training

All employees must complete mandatory Safeguarding Adults and Children training programmes, at Levels 1 to 4 (depending on the employee's role) at a minimum every three years and watch the [NHS England Modern Slavery Awareness](#) YouTube video. All inductees must complete this before commencing normal duties.

Members of the Procurement Senior Team are Chartered Institute of Purchasing and Supply (CIPS) qualified, abide by the CIPS Code of Conduct and have undertaken ethical training related to modern slavery and human trafficking. All members of the Contracting Team are required to complete the Government Commercial College's training course 'Tackling Modern Slavery in Supply Chains: PPE Case Study'

Guidance where modern slavery may be suspected is available to all employees within our safeguarding policies and procedures.

Additional Steps Taken to Address and Remedy Modern Slavery in the Year to 31 March 2023

All new employees at the Trust undergo a series of checks which help to identify possible abuses: Human Resources' interventions include identity and right to work in the UK checks, ensuring people have possession of their own ID documents and correct legal status, and Payroll maintains a fraud identification initiative to check whether multiple salaries (more than

those of two people in a couple) are paid into the same bank account, a sign of possible financial abuse.

The Trust is aware of the potential for victims of modern slavery or human trafficking to present for healthcare at its sites. We are looking at ways to continuously 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. The Trust has implemented the ongoing requirements of Procurement Policy Note PPN 03/23.

The Trust has a dedicated Safeguarding Team with leads trained to Level 7, available every day for 12 hours per day, led by the Associate Director of Professional Standards and Safeguarding, with an out-of-hours procedure for when team members are not on duty. The team works with outside agencies such as Northumbria Police, Northumberland and North Tyneside Councils and Changing Lives to ensure the safety of identified victims.

All patient-facing staff are trained (at a level appropriate to their role) to spot the signs and have defined reporting procedures to follow when met with a potential victim of modern slavery or human trafficking.

Effectiveness

A suite of performance indicators has been created for Social Value within procurement which includes an indicator for Modern Slavery abuses uncovered.

Victims of modern slavery and human trafficking have presented to Trust sites for healthcare, been identified and subsequently rescued from their situation, and gone on to enjoy their lives without restrictions from their abusers. The Safeguarding Team record instances where abuses are suspected or discovered, and further agencies are informed and engaged in supporting victims.

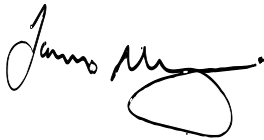
Future Steps

We are committed to the following actions to further improve our effectiveness for the coming year to 31st March 2024

- Develop a new procedure to understand the risk of Modern Slavery across the Trust's supply chain, including improving the mapping of our supply chain to better understand the risk profile of key suppliers.
- The Trust will adopt NHS England's 'Evergreen' Sustainable Supplier Assessment, coming in 2023, which will include a requirement for suppliers to publish an ethical sourcing policy, supply chain risk assessment and conduct Modern Slavery audits in hotspot areas of their supply chain.
- Increase auditing of suppliers whose own supply chains may be more at risk of modern slavery
- Continue to engage with NHS organisations through workshops, webinars and other events to increase awareness of Modern Slavery risks and help to upskill our stakeholders
- Further analyse our procurement categories to identify areas more at risk of modern slavery and create category-specific guidance where needed
- A new Procurement training module will be developed and rolled out to all Band 7 and above employees, including clinical staff, which will have Modern Slavery content.

Approval for this statement

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

A handwritten signature in black ink, appearing to read 'James Mackey', with a large, stylized loop at the end.

SIR JAMES MACKEY
Chief Executive

25th May 2023