North Cumbria Integrated Care NHS Foundation Trust

North Cumbria Integrated Care NHS Foundation Trust and the Modern Slavery Act

Our statement is made in accordance with section 54 of the Modern Slavery Act 2015

This statement sets out the steps that North Cumbria Integrated Care NHS Foundation Trust has taken, and are 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. The Trust 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 putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

The Trust

The Trust employs an estimated 7,000 staff providing acute and community health care, children's services and specialist services such as learning disability and sexual health across Cumbria. Our acute hospital inpatient services are provided from two hospitals based in the North and West of Cumbria with other services provided at various sites throughout the County.

We work closely with a range of partners including commissioners, local councils, North East & North Cumbria Integrated Care Board, NHS England, the private sector and voluntary organisations to deliver innovative and integrated care to our communities.

We are aware of our responsibilities towards patients, service users, employees and the local community and expect all suppliers to the Trust to adhere to the same ethical principles. 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.

Policies and Procedure

Currently all awarded suppliers sign up to our terms and conditions of contract which contain a provision around Good Industry Practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains.

In addition, an increasing number of suppliers are implementing the Labour Standards Assurance System (LSAS) as a condition of contract for tenders within high-risk sectors and product categories and indeed this has been referenced in the Government's Modern Slavery Strategy.
We operate a number of policies to ensure we are conducting business in an ethical and transparent manner. These include:

1. **Recruitment & Selection Policy:** We operate a robust recruitment and selection policy, which includes conducting eligibility to work in the UK checks for all directly employed staff. Agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for all agency staff, to safeguard against human trafficking or individuals being forced to work against their will.

2. **Equal Opportunities:** We have a range of controls to protect staff from poor treatment and/or exploitation, which comply 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.

3. **Safeguarding Policy:** We adhere to the principles inherent within our Trust Safeguarding Policy. This is compliant with the Cumbria multi-agency agreements and provide clear guidance so that our employees are clear on 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.

4. **Freedom to Speak Up Policy:** We operate a Freedom to Speak Up Policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.

5. **Standards of Business Conduct Policy:** This policy explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act. Our approach to procurement and our supply chain includes:

☑ Ensuring that our suppliers are carefully selected through our robust supplier selection criteria/processes.
☑ Requiring that the main contractor provides details of its sub-contractor(s) to enable the Trust to check their credentials.
☑ Randomly request that the main contractor provide details of its supply chain.
☑ Ensuring invitation to tender documents contain a clause on human rights issues.
☑ Ensuring invitation to tender documents also contains clauses giving the Trust the right to terminate a contract for failure to comply with labour laws.
☑ Using the standard Supplier Selection Questionnaire (SQ) that has been introduced (which includes a section on Modern Day Slavery).
☑ Trust staff must contact and work with the Procurement Department when looking to work with new suppliers so appropriate checks can be undertaken.

We are zero tolerant to slavery and human trafficking and thereby expect all our direct and indirect suppliers/contractors to follow suit. Where it is verified that a subcontractor has breached the child labour laws or human trafficking, then this subcontractor will be excluded in accordance with Regulation 57 of the Public Contracts Regulations 2015. The Trust will require that the main contractor substitute a new subcontractor.

Advice, Training and Performance

Advice and guidance about modern slavery and human trafficking is available to staff on our intranet site, through the safeguarding policy and procedures and our Safeguarding Leads. Mandatory safeguarding training is provided together with e-learning programmes regarding both children and adults. We are looking at ways to continuously increase awareness across the Trust, 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.

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain though reporting from our staff, the public, or law enforcement agencies to indicate whether modern slavery practices have been identified.

The Modern Slavery Act Defined

An Act to make provision about slavery, servitude and forced or compulsory labour and about human trafficking; including provision for the protection of victims; to make provision for an Independent Anti-Slavery Commissioner; and for connected purposes.

Definition of Offences:

Slavery, servitude and forced or compulsory labour: A person commits an offence if;

i. The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or;
ii. The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

Human Trafficking: A person commits an offence if;

i. The person arranges or facilitates the travel of another person (victim) with a view to being exploited.
ii. It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

I. Exploitation: A person is exploited if one or more of the following issues are identified in relation to the victim;
II. Slavery, servitude, forced or compulsory labour.
III. Sexual exploitation
IV. Removal of organs
V. Securing services by force, threats and deception
VI. Securing services from children, young people and vulnerable persons.