

Modern Slavery and Human Trafficking Act 2015 Statement

1. Background

From 29th October 2015, the Modern Slavery Act 2015 (the Act) required commercial organisations, including all NHS organisations, to make a public statement as to the actions they have taken to detect and deal with forced labour and trafficking in their supply chains- the Transparency in Supply Chains obligation.

The Act requires a slavery and human trafficking statement to be approved and signed at Governing Body level. This ensures senior level accountability, leadership and responsibility for modern slavery and gives it the serious attention it deserves.

Dr Hilary Garratt, Director of Nursing, from NHS England said: “Frontline practitioners across the NHS have a critical role in identifying, supporting and caring for these vulnerable individuals and this is at the heart of our safeguarding leadership role.”

Recent research has highlighted that many victims of human trafficking come into contact with NHS services during the time they are trafficked, or after their escape.

2. Introduction

Worcestershire Acute Hospitals NHS Trust (WAHT) 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.

At Worcestershire Acute Hospitals NHS Trust (WAHT) we are committed to ensuring that no modern slavery or human trafficking takes place in any part of our business or our Supply chain. This statement sets out actions taken by WAHT to understand all potential modern slavery and human trafficking risks and to implement effective systems and controls. The Section 54 of the Modern Slavery Act 2015 requires all organisations to set out the steps the organisation 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. WAHT adheres to safe recruitment principles including the requirements in respect of identity checks, work permits and criminal record checks.

3. Organisational Structure

Worcestershire Acute Hospitals NHS Trust provides hospital based services from three main sites; the Alexandra Hospital in Redditch, Kidderminster Hospital and Treatment Centre, and Worcestershire Royal Hospital in Worcester as well as some community based services.

We provide a wide range of services to a population of more than 595,786 people in Worcestershire as well as caring for patients from surrounding counties and further afield. The Trust’s catchment population extends beyond Worcestershire itself, as patients are also attracted from neighbouring areas including South Birmingham, Warwickshire, Shropshire, Herefordshire, Gloucestershire and South Staffordshire. This results in a catchment population which varies between 420,000 and 800,000 depending on the service type.

In 2020/21 we provided care to more than 242,643 different Worcestershire patients – that is 40% of the Worcestershire population receiving care at one of our hospitals.

We saw 664 patients per day, including:

- 128,473 A&E attendances (WRH, ALX and KTC)
- 118,114 Inpatients
- 458,225 Outpatients
- 4,863 births
- 4,950 babies

We employ 6,748 staff and have 423 volunteers who support the Organisation helping to deliver the services we provide. Our annual turnover is £559 million (2020/21).

4. Our Policy on Slavery and Human Trafficking

When procuring goods and services, we additionally apply NHS Terms and Conditions (for nonclinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with relevant legislation.

The Trust has internal policies and procedures in place that assess supplier risk in relation to the potential for modern slavery or human trafficking. 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.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the procurement department taking responsibility for overall compliance.

4.1 Reporting concerns

WAHT has systems in place to encourage the reporting of concerns and has a named Freedom to Speak up Guardian and Freedom to Speak Up (raising concerns) Policy. Safeguarding concerns in relation to modern slavery and human trafficking are reported in to a first responder organisation such as the Police, adult or children's Social Care Safeguarding teams or directly to the Modern Slavery Helpline.

The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. Modern slavery is a complex crime and may involve multiple forms of exploitation.

4.2 COVID19 Pandemic

Evidence shows that the pandemic has increased vulnerability to modern slavery all over the world, including in the UK, as many of the underlying drivers of modern slavery have worsened, such as poverty, inequality and unemployment. Current evidence suggests certain groups, sectors and geographies have become more vulnerable to modern slavery during the pandemic e.g. low- and middle-income countries, children, migrant and informal workers, women and girls.

There is evidence to suggest that traffickers have adapted their methods during the ongoing pandemic. Lockdown increased the risk of online exploitation and reduced identification of the most vulnerable within our society to modern slavery or human trafficking.

5. Due Diligence within our Supply Chain

Our Supply Chain is made up of a number of large multi-national companies, Small to Medium Enterprises (SME's) and small local suppliers who make up a total of 4,791 live suppliers to the Trust at this current time.

The location of supplier premises and manufacture locations are spread globally but the vast majority are situated in the European Union, where it is estimated that several hundred thousand people work for the aforementioned suppliers although not all these people work on WAHT related goods and services.

Due to the nature of our business and our approach to governance and risk management, we assess that there is low risk of slavery and human trafficking in our business and supply chains. However, we will continue to periodically review the effectiveness of our relevant policies, procedures and associated training to ensure that the risk remains low.

Therefore to identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain we will:

- Purchase a significant number of products through NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour;
- Utilise national Contracts and Framework Agreements that contain specific clauses around this subject;
- Where possible, build long standing relationships with suppliers;
- The Trust will request all suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through agreement of our 'Supplier Code of Conduct', purchase orders and tender specifications. All of which will set out our commitment to ensuring no modern slavery or human trafficking related to our business;
- Uphold professional codes of conduct and practice relating to procurement and supply, including through our Procurement Team's membership of the Chartered Institute of Procurement and Supply;
- The Trust will request all suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through acceptance of the standard Terms and Conditions of contract for the procurement of goods and services;
- As an NHS Provider, the Trust undertakes audit in accordance with NHS financial reporting standards.

6. Training

WAHT recognises safeguarding as a high priority for the organisation and has clear policies and procedures in place in relation to safeguarding children and adults. Modern slavery and human trafficking is included in all levels of mandatory safeguarding adult and children training. The department's senior procurement team are all Chartered Institute of Purchasing and Supply (CIPS) qualified and abide by the CIPs code of professional conduct.

The WAHT considers the principal risks related to slavery and human trafficking and identifies them as:

- Reputational
- Lack of assurances from suppliers
- Lack of anti-slavery clauses in contracts
- Training staff to maintain the trust's position around anti-slavery and human trafficking.

We do not have key performance indicators in relation to slavery or human trafficking as any instance would be expected to be a breach of law, our supplier standards and/or our local policies and therefore acted upon accordingly.

7. Aim

The aim of this statement is to demonstrate the WAHT follows good practice and all reasonable steps are taken to prevent slavery and human trafficking.

8. Executive Directors' Approval

The Executive Director Lead for Safeguarding has considered and approved this statement on behalf of the Board and will continue to support the requirements of the legislation.

Signed:



Paula Gardner
Chief Nursing Officer