

Modern Slavery and Human Trafficking Act 2015 Statement

1. Background

The Transparency in Supply Chains provision in the Modern Slavery Act (2015) seeks to address the role of businesses in preventing modern slavery from occurring in their supply chains and organisations. Every organisation in the UK with a total annual turnover of £36m or more is required to produce a slavery and human trafficking statement for each financial year of the organisation.

As an NHS Provider with a turnover for 2023/24 in excess of £699m, Worcestershire Acute Hospitals NHS Trust is required 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.

2. Modern Slavery

Modern Slavery is an umbrella term that encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force vulnerable individuals into a life of abuse, servitude and inhumane treatment. A large number of active organised crime groups are involved in modern slavery. However, it is also committed by individual opportunistic perpetrators.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist.

Someone is in slavery if they are:

- forced to work - through mental or physical threat;
- owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- dehumanised, treated as a commodity or bought and sold as 'property';
- physically constrained or has restrictions placed on his/her freedom of movement.

Contemporary slavery takes various forms and affects people of all ages, gender and races. Victims are often hidden away, may be unable to leave their situation, or may not come forward because of fear or shame.

3. Worcestershire Acute Hospitals NHS Trust Statement of intent

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.

It looks likely that the number of victims of modern slavery globally will continue to rise over the coming years. Thousands of people across the UK are being held in squalor and made to undertake forced labour. Some of these may be fleeing war zones, others may have financial problems, but all find dreams turn to nightmare as their lives descend into one of fear, debt and drudgery in exhausting, ill-paid, dangerous and degrading work, with escape impossible, forbidden or punished. The importance of spotting the signs early, raising awareness and reporting are therefore key, in order to safeguard victims and bring the traffickers to justice (National Crime Agency).

WAHT is 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. 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 is a large acute and specialised hospital Trust that provides a range of local acute services to a population of more than 600k 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.

The 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 employ in the region of 7500 staff and volunteers who support the organisation to deliver the services we provide. Our annual turnover was in excess of £699 million for the financial year 2023/2024.

4. Our Policy on Slavery and Human Trafficking

When procuring goods and services, we 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 to work with the procurement department in order for the successful prevention of slavery and human trafficking. The procurement department takes responsibility where a National Framework Agreement or formal exercise in line with standing financial instructions (SFI) has been undertaken.

5. 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. This is further supported by Freedom to Speak Up champions across the organisation.

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.

6. Associated Policy & Procedure

The Trust has a number of Policies and Procedures that support this statement:

- Safeguarding Adults, Children and Young People
- Recruitment and Selection
- Procurement Strategy
- Freedom to Speak Up

7. 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 2500 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.

8. Training

WAHT recognises safeguarding as a high priority for the organisation and has clear policies and procedures in place in relation to safeguarding children, young people and adults. Modern slavery and human trafficking is included in all levels of mandatory safeguarding adult and children training.

Clear links to support / resources are available on the Trust Safeguarding Pathway on the intranet.

The procurement department's senior procurement team are all Chartered Institute of Purchasing and Supply (CIPS) qualified and abide by the CIPs code of professional conduct.

Procurement team members commit to undertake the Government Commercial College training on modern slavery.

9. Risk Assessment

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 that WAHT follows good practice and that all reasonable steps are taken to prevent modern 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:

Sarah Shingler

Chief Nursing Officer