

## TRUST RESPONSE TO THE REQUIREMENTS OF THE MODERN SLAVERY ACT 2015

The Robert Jones and Agnes Hunt Orthopaedic Hospital NHS Foundation Trust (“the Trust”) fully supports the Government’s objective to eradicate Modern Slavery and human trafficking and recognises the significant role the NHS has to play in both combatting it and supporting victims.

Information on the Trust’s governance structure, which underpins delivery of this agenda, can be found at [Trust Documents - RJAH](#)

Information on particular policies and procedures which support the delivery of this agenda are outlined in this Statement.

The Modern Slavery Act 2015, including the definitions of slavery, servitude and forced or compulsory labour, human trafficking and exploitation covered by the Act can be viewed at:

[https://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga\\_20150030\\_en.pdf](https://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf)

## PROCUREMENT

The Trust operates in accordance with **Procurement Policy Note – Tackling Modern Slavery in Government Supply Chains - PPN 02/23**

### *ACTIONS / AWARENESS*

Section 54 of The Modern Slavery Act requires suppliers with an annual turnover in excess of £36M and carrying out a business, or part of a business, in the UK, to develop a Modern Slavery Statement.

- Further to the publication of the subject PPN and new guidelines, from 1<sup>st</sup> April 2023 In-Scope Organisations must use the guidance ‘Tackling Modern Slavery in Government Supply Chains’ to identify and manage risks in both ‘**new**’ procurement activity and ‘**existing**’ contracts.
- In support of the above, Procurement need to use the designated GOV table (Page 6 onwards in below link) to assess any risk of modern slavery, which has now been updated to include current global modern slavery risks in key sectors of concern such as cotton, PPE and polysilicon. We also need to note that there is a new requirement for supply chain information to now be provided at the selection stage of new procurements deemed as high risk of modern slavery (applies to new and existing contracts where applicable)  
[PPN\\_02\\_23 - Update to Tackling Modern Slavery in Government Supply Chains 2023 - Guidance.pdf \(publishing.service.gov.uk\)](#)
- We also note that there is additional guidance on enhanced due diligence activities and on using existing exclusion grounds more effectively.

### *ACTIONS FOR EXISTING CONTRACTS*

- Carry out a Modern Slavery risk assessment on our existing contracts where applicable.
- Conduct supply chain mapping exercise(s) where applicable and then invite suppliers to complete the Modern Slavery Assessment Tool (if appropriate)
- Continue to work in collaboration with existing suppliers to address modern slavery risks and monitor progress. Put action plans in place to mitigate the risks identified.
- Work with the suppliers on high and medium risk contracts to mitigate the risks through strengthened contract management (NCP)
- Repeat this exercise at least annually for high-risk contracts and at reasonable intervals for medium risk contracts.

### *ACTIONS FOR NEW CONTRACTS*

- Assess modern slavery risks in new procurements.
- Identify which contracts are at high or medium risk of modern slavery based on industry type, complexity of supply chain, the nature of the workforce, context in which the supplier operates, type of commodity and supplier location.

- Pre-procurement & Specification: Design new procurements in line with the associated risk level including (if appropriate) application of the Social Value Model.
- Selection Stage: Consider the mandatory and discretionary exclusion grounds as set out in the Standard Selection Questionnaire. For high-risk procurements, Part 1 and 2 declarations should be submitted for supply chain members.
- Award Stage: Apply tender response questions relating to modern slavery where they link to the specification, taking a proportionate approach.
- Contract Conditions: Consider including specific terms and conditions to strengthen contractual protection.

**MSAT TOOL** [Modern Slavery Assessment Tool - Supplier Registration Service \(cabinetoffice.gov.uk\)](https://www.cabinetoffice.gov.uk/modern-slavery-assessment-tool)

#### **THE POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

Human Trafficking and Modern slavery guidance is included in the Trust's Safeguarding of Vulnerable Adult and Safeguarding Children and Young People Policy, for further advice and guidance please refer the West midlands Adult and child protection procedures. [Welcome | West Midlands Safeguarding Children Group \(procedures.org.uk\)](https://www.westmidlands.gov.uk/childrens-services) [WM Adult Docs \(safeguardingwarwickshire.co.uk\)](https://www.safeguardingwarwickshire.co.uk/)

The response to Human Trafficking and Modern Slavery is coordinated under the safeguarding adult and/or safeguarding children process. The police are the lead agency and staff are directed to the appropriate Home Office website for further information.

#### **THE DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING IN ITS BUSINESS AND SUPPLY CHAINS.**

The Trust is committed to ensuring that there is no Modern Slavery or Human Trafficking in our supply chains or in any part of our business.

The Trust adheres to the National NHS Employment Checks / Standards. This includes employees' identity, right to work in the UK and compliant references.

The Trust has in place systems to encourage the reporting of concerns and the protection of whistle blowers. Where possible we build long standing relationships with our suppliers and make clear our expectations of business behaviour. With regards to national or international supply chains, we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

#### **THE PARTS OF ITS BUSINESS AND SUPPLY CHAINS WHERE THERE IS A RISK OF SLAVERY AND HUMAN TRAFFICKING TAKING PLACE, AND THE STEPS IT HAS TAKEN TO ASSESS AND MANAGE THAT RISK.**

The Trust is committed to social and environmental responsibility and has zero tolerance for Modern Slavery and Human Trafficking. Any identified concerns regarding Modern Slavery and Human Trafficking would be escalated as part of the organizational safeguarding process and in conjunction with partner agencies; such as the Local Authority and Police.

#### **THE EFFECTIVENESS IN ENSURING THAT SLAVERY AND HUMAN TRAFFICKING IS NOT TAKING PLACE IN ITS BUSINESS OR SUPPLY CHAINS, MEASURED AGAINST SUCH PERFORMANCE INDICATORS AS IT CONSIDERS APPROPRIATE.**

The Trust aim to be as effective as possible in ensuring that modern slavery and Human Trafficking is not taking place in any part of our business or supply chains:

- I. Audit of all safeguarding referrals.

- II. NHS employment checks and payroll systems.
- III. Level of communication with next link in the supply chain and their understanding of, and compliance with, our expectations in relation to the NHS terms and conditions. These conditions relate to issues such as bribery, slavery and other ethical considerations.

**TRAINING ABOUT SLAVERY AND HUMAN TRAFFICKING IS AVAILABLE TO ITS STAFF.**

Reference is currently made to Slavery and Human Trafficking within the organisation's Mandatory Safeguarding Children training programme, induction, eLearning and training updates.

**This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our organisation's modern slavery and human trafficking statement for the current financial year.**

**Approved by the Board of Directors on 28 June 2024.**