

Trust Response to the Requirements of the Modern Slavery Act 2015

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.

Exploitation.

A person is exploited if one or more of the following issues are identified in relation to the victim;

I. Slavery, servitude, forced or compulsory labour.

II. Sexual exploitation

III. Removal of organs

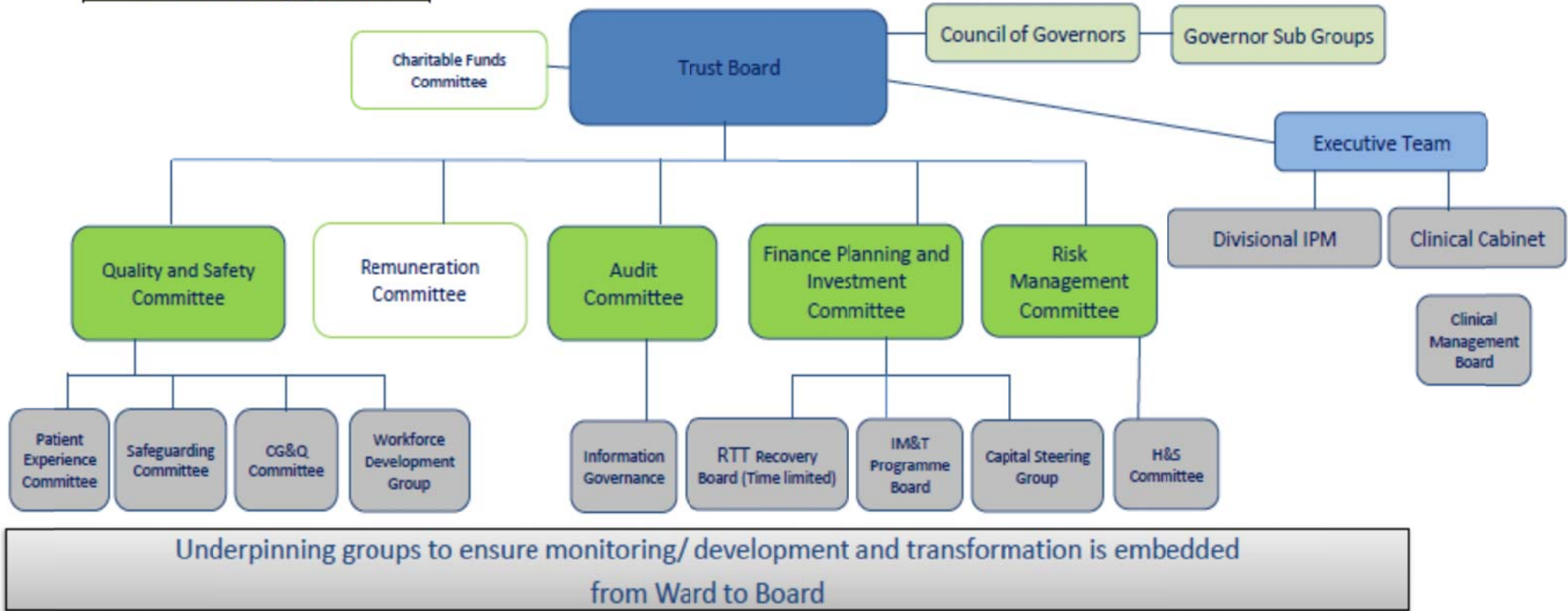
IV. Securing services by force, threats and deception

V. Securing services from children, young people and vulnerable persons.

The Organizational Structure, Business and Supply Chain

The diagram below describes the organizational governance structure that supports the delivery of the safeguarding adult and children agenda.

KEY
Overall accountability
Board Assurance
Managerial accountability
Committee assurance and performance management
Stakeholder engagement



Procurement

The Trust Procurement Policy and Principles will be updated to include a commitment to the Trust's obligations under the Act and to action it intends to take in its Procurement Process. In addition, template commercial agreements will be updated to include an obligation that suppliers will comply with **the Act** and ensure that their suppliers and sub-contractors will too;

The Procurement department will identify and prioritise high risk areas in **the** supply chain utilising guidance and resources as available, especially the Chartered Institute of Purchasing and Supply, and also

www.cips.org/Documents/Knowledge/Procurement-Topics-and-Skills/4Sustainability-CSR-Ethics/Sustainable-and-Ethical-Procurement/tackling-modern-slavery-in-modern-supply-chains.pdf

There are no specific obligations placed on public sector procurers under the Act, albeit there will be an expectation that procurers seek some confirmation that suppliers are complying with their obligations, as applicable. The Department of Health is looking to reflect new requirements under the Modern Slavery Act in the next update of the NHS terms and conditions, which should be around Spring time this year.

The Policies in Relation to Slavery and Human Trafficking

Human Trafficking and Modern slavery guidance is included in the Trust's Safeguarding Vulnerable Adult Policy. Further information will be contained within the Trust's Children and Safeguarding Practice Policy.

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.

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.

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

We have 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.

Robert Jones & Agnes Hunt NHS Foundation 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.

We 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 (i.e. people bought into the country illegally will not have a National Insurance number)
- 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 organization's Mandatory Safeguarding Children training programme; levels one to three and compliant with the recommendations in the *Safeguarding Child and Young People: Roles and competences for Health Care Staff; Intercollegiate Document. Third Edition; March 2014. Royal College of Paediatrics and Child Health.*

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.