

Meeting:	People and Culture Committee				
Meeting Date:	10 th January 2024	Agenda item:			
Report Title:	Modern Slavery Statement				
Author:	John Syson Director of People				
Executive Sponsor:	John Syson Director of People				
Implications					
Link to key strategic objectives <i>[highlight which KSO(s) this recommendation aims to support]</i>					
KSO1 - Quality	KSO2 - Engagement		KSO3 – Healthy Lives		
Access to safe, compassionate and timely care for our patients	Improving our organisational culture and enabling staff to achieve their full potential		Transform how we work to deliver improved care and health outcomes for our communities		
Board assurance framework					
Significant risk register					
	Y/N	If Yes state impact/ implications and mitigation			
Quality	N/A				
Legal and regulatory	Y	Requirement for organisations to approve and publish Modern Slavery Statements			
Financial	N				
Assurance route					
Previously considered by:	N/A				
Executive summary					
Action required: <i>[highlight one in bold]</i>	Approval	Information	Discussion	Assurance	Review
Purpose of the report:	To update the Trust's Modern Slavery statement for 2024/25				
Summary of Key issues:	<p>Section 54 (1) of the Modern Slavery Act (2015) requires commercial organisations operating in the UK with an annual turnover of £36m to produce a slavery and human trafficking statement for each financial year of the organisation.</p> <p>The Statement has been updated to make it easier for stakeholders to see our alignment and commitment to the Modern Slavery Act 2015 and to highlight areas where we are strengthening our commitment to tackling Modern Slavery, such as through our procurement process and updates to NHS Terms and Conditions.</p> <p>The statement will be refreshed again for 2025/26.</p>				
Recommendation:	To approve the statement to go to the Trust's Board in February 2024				
Acronyms					

Introduction

Section 54 (1) of the Modern Slavery Act (2015) requires commercial organisations operating in the UK with an annual turnover of £36m to produce a slavery and human trafficking statement for each financial year of the organisation.

The Act specifies two legal requirements for the statement: 1. Statements must be published on the organisation website with a link in prominent place on the UK homepage 2. Statements should be approved by the board of directors and signed by a director.

There have been no legal or statutory changes made during since 2020/21 to the requirements of the act.

Background

The 2022 update to the NHS Terms and Conditions will strengthen our position on Modern Slavery, including increasing supplier obligations and the option to terminate for breaches in social and labour laws.

As part of the NHS Net Zero commitment outlined in the 2020 “Delivering a ‘Net Zero’ National Health Service” report, we have published the NHS Supplier Roadmap. As part of the roadmap, the annual self-assessment (the Sustainable Supplier Assessment) will include Modern Slavery requirements.

From 1st April 2022, all NHS Trusts will be required to adopt central government’s Social Value Model (Procurement Policy Note 06/20) which requires a 10% minimum requirement for Net Zero and Social Value in all procurements. Modern Slavery features prominently and specific guidance to NHS organisations on how to apply this to health care settings has been provided.

There are two main areas of anti-slavery action, relating to People and Procurement and the amended statement covers these.

Appendix 1: Modern Slavery Statement for 2024/25

Queen Elizabeth Hospital Kings Lynn Modern Slavery and Human Trafficking statement for 2024/25

The Trust is fully aware of our responsibilities towards patients, service users, employees and the local community and expects all suppliers to the Trust to adhere to the same ethical principles. The Trust is committed and will not tolerate modern slavery in any of its forms of slavery and servitude, forced or compulsory labour and human trafficking within our activities or our supply chains.

The Trust continues to fully support the government's objective to eradicate modern slavery and human trafficking and we acknowledge our role in both combating it and supporting victims. The Trust is committed to ensuring our supply chains and our business activities are free from ethical and labour standards abuse.

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; and that they conduct their businesses in a manner that is consistent with the Trust's stance on anti-slavery.

People - Human resources policies provide processes and procedures to ensure that our employees are treated fairly at all times; these include:

- Confirming the identities of all new employees and their right to work legally in the UK.
- To have assurance from approved agencies that pre – employment clearance has been obtained for agency staff and to safeguard against human trafficking.
- All staff appointed are subject to references, immigration and identity checks, this is to ensure staff have the legal right to work in the UK.
- Adopting the national pay, terms and conditions of service, the Trust has the assurance that all staff will be treated, fairly and that pay, terms and conditions will comply with the latest legislation.
- The Trust has various employment policies and procedures in place designed to provide guidance and advice to staff and managers and also to comply with the relevant legislation. These are accessible on the intranet.
- The Freedom to Speak Up Guardian service exists to support employees in raising concerns, including about poor working practices.
- All staff are required to undertake mandatory training in relation to diversity and inclusion and safeguarding.

Procurement - 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;
- Random requests that the main contractor provides details of its supply chain;
- Ensuring invitation to tender documents contain a clause on human rights issues;
- Ensuring invitation to tender documents also contain 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.

- Supplier adherence to our values: the Trust has zero tolerance 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.

A handwritten signature in black ink, appearing to read 'John Syson', with a long horizontal flourish extending to the right.

John Syson
Director of People