

## **MODERN SLAVERY ACT 2015**

### **Worcestershire Health & Care NHS Trust Statement 2017/2018**

#### **1 Introduction**

The Modern Slavery Act 2015 is designed to consolidate various offences relating to human trafficking and slavery which includes servitude, being forced or deceived into work, not able to leave freely and easily without threat to themselves or their family resulting in undesirable or unsafe conditions.

In compliance of the Act this annual statement demonstrates:

- transparency in supply chains demonstrating good practice in our responsibility and steps taken to prevent slavery and human trafficking
- the steps taken during the previous financial year to ensure that human trafficking is not taking place in any part to the supply chain and organisation
- the action plan for the current financial year

The statement and actions are approved by the Board of Directors via the Trusts Audit Committee and signed off by the Director of Finance on behalf of the Trust.

#### **2 Worcestershire Health and Care NHS Trust (WHCT or the Trust)**

Worcestershire is a mixed urban and rural county consisting of six districts: Bromsgrove; Malvern; Redditch; Worcester City; Wychavon and Wyre Forest. WHCT is a Mental Health and Community Trust providing the following services throughout the county and beyond:

- Community Care
- Adult Mental Health
- Learning Disabilities
- Children, Young People and Families
- Specialist Primary Care including Sexual Health; Dental Services;

We employ approximately 4000 staff, servicing a population of approximately 570,000 with an annual turnover of £172 million.

#### **3 Our Business and Supply Chain**

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. During 2017 the Trust will be writing to all suppliers requesting them to affirm their compliance with the legislation.

From this data Procurement will be able to monitor the number contracts (both national and local) within our supply chain that comply to the MSA.

The procurement department's senior team are all members of the Chartered Institute of Purchasing and Supply (CIPS) and abide by the CIPs code of professional conduct. Over the next year, specific training will be provided for the Trusts internal supply chain management related to modern slavery and human trafficking.

Part of future development will be to schedule MSA training awareness to all relevant key employees.

Information on modern slavery and human trafficking will be shared through the Trust's internal communications methods.

Most of our goods and services are sourced from local or national suppliers. Further work will be required in partnership with our contractors to understand the source of goods supplied.

To date we have:

- Reviewed our supply chain and identified general potential areas of risk including:
  - Provision of Food
  - Construction
  - Cleaning
  - Clothing (work wear)

We will contact the suppliers within these Supply Chains and ask them to confirm that they are compliant with the Act.

- Contact our key suppliers and request confirmation from them that they too are compliant with the Act.

We will also be:

- Introducing a 'Supplier Code of Conduct' and asking all existing and new suppliers to confirm their compliance
- Adding evidence gathering questions into our tendering procedures
- Compliance will be mandated through Trust tender / contract processes
- Within 12 months an audit will be undertaken against contracted suppliers

#### 4 Modern Slavery and Human Trafficking Act 2015 Annual Statement

Modern Slavery is a global issue existing in every type of economy. **Worcestershire Health & Care NHS Trust (WHCT) has a zero tolerance approach to Modern Slavery within our Service and Supply Chain.** All members of staff have a personal responsibility for the prevention of slavery and human trafficking with the procurement department taking responsibility lead for overall compliance.

The Trust has evaluated the principal risks related to slavery and human trafficking as:

- Lack of assurances from suppliers
- Lack of appropriate clauses in contracts
- Reputational

Should there be a breach of the Act within the supply chain the Trust will take action in accordance to the investigatory evidence. This may range from termination of the contract to the Trust giving notice to a supplier to make improvements within a specified time, failure to respond could then result in the termination of the contract.

#### 5 Steps taken during the previous financial year (2016/17) to ensure slavery and human trafficking is not taking place

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.

To date we have:

- Reviewed our supply chain and identified general potential areas of risk including:
  - Provision of Food
  - Construction
  - Cleaning
  - Clothing (work wear)
- We have contacted the suppliers within these Supply Chains and have asked them to confirm that they are compliant with the Act
- Contacted our key suppliers and requested confirmation from them that they too are compliant with the Act

## 6 Actions for the current financial year 2017/18

- During 2017 the Trust will be writing to all suppliers requesting them to affirm their compliance with the legislation
- Introducing a 'Supplier Code of Conduct' and asking all existing and new suppliers to confirm their compliance
- Adding evidence gathering questions into our tendering procedures
- The procurement department's senior team are all members of the Chartered Institute of Purchasing and Supply (CIPS) and abide by the CIPs code of professional conduct. Over the next year, specific training will be provided for the Trusts internal supply chain management related to modern slavery and human trafficking
- The Trust's Inclusion and Equality Policy will include the Modern Slavery Act 2015 advising employees and managers of their responsibility and what action they can take if they have any concerns. The Policy will make reference to HR and Corporate policies where the Act has direct impact/relevance and where the Trust Statement can be found
- The Trusts 'Recruitment and Selection' guidelines; 'Raising Concerns at Work' and other policies and guidelines will be updated to incorporate the requirements of the Act. This will be extended to Bank and Agency worker contracts to reflect the same standard as required for a Trust Employee
- Where potential or actual risk has been identified the Trust will review the severity of the breach and where necessary terminate contract / arrangements

## 7 Due Diligence and Assurance

To support the production of the statement assurance mechanisms will be put in place, including the use of Internal Audit. Internal Audit's work would include a review of the systems in use by the Trust that seek appropriate assurance from other organisations.

Internal audit undertake an annual audit on financial control as part of their audit plan. The audit includes a statutory compliance element. In future this will include the modern slavery and human trafficking act requirements.

Information on modern slavery and human trafficking has been shared through the Trust's internal communications methods.

Advice and training about slavery and human trafficking is available to staff through the Safeguarding Team.

Further information on Modern Day Slavery can be found by visiting:

<https://modernslavery.co.uk/>

Performance indicators will be developed during the year to provide the reader with an ability to assess the effectiveness of the statement.

The Board of Directors has considered and approved this statement and will continue to support the requirements of the legislation.

Director of Finance

Chair Chief Executive