

Modern Slavery and Human Trafficking Act 2015 Statement

1. Introduction

The UK Modern Slavery Act requires all businesses with commercial operations in the UK and a turnover in excess of £36m to publish an annual statement setting out the steps that they have taken to ensure that slavery and human trafficking do not exist in their business or their supply chains.

At North West Anglia NHS Foundation Trust (NWAngliaFT) we are 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 NWAngliaFT 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.

2. Organisational Structure

The Trust delivers acute care services to a growing catchment that encompasses Peterborough, South Lincolnshire, Cambridgeshire, Norfolk and Leicestershire.

3. Our Policy on Slavery and Human Trafficking

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% 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 for successful prevention of slavery and human trafficking with the procurement department taking responsibility for overall compliance.

Trust staff are required to contact and work with the Procurement department when looking to work with new suppliers, so that appropriate checks can be undertaken.

4. Due Diligence

To identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain we:

- Purchase a significant number of products through EU compliant NHS, national and regional contracts (Framework Agreements) which include but are not limited to agreements provided by NHS Supply Chain (NHSSC) whose contract is managed by NHS Business Services Authority (NHSBSA), Crown Commercial Service (CCS) and East of England Collaborative Procurement Hub (EOECPH) whose 'Supplier Code of Conduct' includes a provision around forced labour.
- Where possible, build long standing relationships with suppliers.
- The Trust will request all suppliers comply with the provisions of the UK Modern

Slavery Act (2015) through agreement of our 'Supplier Code of Conduct' purchase orders, tender specifications and reference to NHS terms and conditions of contract, section 10 Warranties (10.1.21 and 10.1.22 refer). All of which will set out our commitment to ensuring no modern slavery or human trafficking is 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 ask for evidence of existing policy as part of formal tender processes.
- The Trust undertakes an annual audit on non-pay expenditure 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.

5. Training

With regard to training NWAngliaFT has not undertaken any specific training of staff. The department's senior procurement team are all Chartered Institute of Procurement and Supply (CIPS) qualified and abide by the CIPs code of professional conduct.

Over the next year, the NWAngliaFT internal supply chain management will be required to undertake specific training related to modern slavery and human trafficking.

NWAngliaFT 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 on anti-slavery and human trafficking.

6. Aim

The aim of this statement is to demonstrate that NWAngliaFT follows good practice and all reasonable steps are taken to prevent slavery and human trafficking.

7. Board of Directors' Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. The Board of Directors has considered and approved this statement and will continue to support the requirements of the legislation.

Rob Hughes
Chairman

1 April 2017

Stephen Graves
Chief Executive

1 April 2017