



North West Anglia
NHS Foundation Trust

REPORT TO THE TRUST BOARD (PUBLIC)

TITLE	Modern Day Slavery Act 2015 - Annual Statement 2020/2021
AUTHOR	Kim Graves, Corporate Governance & Compliance Manager Paul Denton, Deputy Company Secretary
EXECUTIVE SPONSOR	Taff Gidi, Company Secretary
DATE OF MEETING	28 July 2020
PRESENTED FOR	Approval

PURPOSE OF THE REPORT

This paper provides the Trust's Modern Day Slavery Statement. It also details the actions and steps taken to ensure that Human Slavery and Trafficking does not occur within the Trust.

EXECUTIVE SUMMARY

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that North West Anglia NHS Foundation Trust has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain.

As outlined in the introduction to the statement North West Anglia NHS Foundation Trust has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

COMMITTEES/SUBGROUP WHERE THIS ITEM HAS BEEN CONSIDERED

n/a

RECOMMENDATIONS

1. The Board is asked to approve the statement.

STRATEGIC GOALS THIS REPORT SUPPORTS *(Check all that apply)*

Delivering outstanding care and experience	<input checked="" type="checkbox"/>
Recruiting developing and retaining our workforce	<input checked="" type="checkbox"/>
Improving and developing our services and infrastructure	<input checked="" type="checkbox"/>
Working together with local health and social care providers	<input checked="" type="checkbox"/>
Delivering financial sustainability	<input checked="" type="checkbox"/>

RISKS RELEVANT TO THE PAPER

Risk ID	Risk Description
n/a	n/a

OTHER IMPLICATIONS OF THE PAPER

Legal/ Regulatory Relevance:	NHS Improvement License: FT4: Foundation Trust Governance
NHS Constitution Delivery	The NHS aspires to the highest standards of excellence and professionalism. The NHS works across organisational boundaries.
Freedom of Information Release	This report can be released under the Freedom of information Act 2000.

Equality and Diversity Implications *(Check all that apply)*

Age	Gender	Ethnicity	Disability	Pregnancy/ Maternity	Marriage/ Civil Partnership	Religion/ Belief	Sexual Orientation	Gender Reassignment
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Additional comments</i>								



Outstanding Health and Wellbeing



Outstanding People



Outstanding Patient Care



Outstanding Leadership



Outstanding Communications

MODERN DAY SLAVERY ACT 2015 – ANNUAL STATEMENT 2020/2021

1. INTRODUCTION

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that North West Anglia NHS Foundation Trust has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. North West Anglia NHS Foundation Trust has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

2. AIM OF THIS STATEMENT

The aim of this statement is to demonstrate that North West Anglia NHS Foundation Trust follows good practice and all reasonable steps are taken to prevent slavery and human trafficking within our business or supply chain.

All members of staff within the organisation have a personal responsibility for the successful prevention of modern slavery and human trafficking, with the Procurement Department taking a lead responsibility for compliance in the supply chain.

3. ABOUT THE ORGANISATION

North West Anglia NHS Foundation Trust is a statutory, not-for-profit, public benefit corporation and runs three acute hospitals - Peterborough City, Hinchingbrooke and Stamford and Rutland. In addition, it delivers Outpatient and Radiology services at Doddington Hospital, the Princess of Wales Hospital, Ely and North Cambs Hospital, Wisbech. The Trust provides and develops healthcare according to the core NHS principles: free care, based on need and not ability to pay.

The Trust delivers acute care services to a growing catchment of approximately 700,000 residents living in Cambridgeshire, South Lincolnshire and the neighbouring counties of Norfolk and Bedfordshire.

The main purchasers of our Trust's services are Cambridgeshire and Peterborough Clinical Commissioning Group and South Lincs Clinical Commissioning Group. However our catchment area falls within the boundaries of South West Lincolnshire Clinical Commissioning Group, East Leicestershire and Rutland Clinical Commissioning Group and Bedfordshire Clinical Commissioning Group.

4. OUR STAFF

All our staff are employed in line with nationally agreed pay frameworks. We confirm the identities of all new employees and their right to work in the United Kingdom and pay all our employees in line with best practice national guidance. Our Grievance &

Dispute Policy and Raising Concerns in a Safe Environment Policy, additionally give a platform for our employees to raise concerns about poor working practices.

5. WHISTLEBLOWING

The Trust has a process for investigating any concerns raised to by our staff in line with national guidance. Our staff are encouraged to raise concerns in line with our Raising Concerns Policy without fear of retaliation. The policy also provides for concerns to be raised anonymously, if required. Staff also have the option to escalate concerns to the National Guardian's Office if they are not satisfied with the outcome of the internal investigation.

6. SAFEGUARDING AND AWARENESS TRAINING

Modern Slavery awareness is integrated into our safeguarding policies and training. Awareness is also raised through information sharing on the Trust intranet and on the Trust website. This is to ensure that our staff know how to raise concerns if they suspect modern slavery or human trafficking when interacting with patients or service users.

Training on modern slavery and human trafficking is available to staff through Trust induction. Further training is also undertaken as part of the Trust's mandatory Safeguarding Adults and Children training programmes including clinical update days with further emphasis delivered within the level 3 training programmes.

We are continuously looking at ways to increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

7. WORKING WITH SUPPLIERS

North West Anglia NHS Foundation Trust will work to identify and mitigate risk and put in place contractual terms which will allow the Trust to gain assurance that slavery and human trafficking have no place in our business. North West Anglia NHS Foundation Trust will work with suppliers to ensure that they treat their obligations towards modern slavery with the same importance that we do.

Suppliers are vetted through a robust Pre-Qualification Selection Questionnaire prior to being appointed to any contractual agreement that is managed by the Procurement team. It addresses specific questions around the Modern Slavery Act and any breaches of labour laws which result in disqualification of unsuitable organisations.

All contracts are awarded under the NHS Terms and Conditions which contain clauses giving North West Anglia NHS Foundation Trust the right to terminate a contract for failure to comply with labour laws.

When procuring goods and services, we apply NHS Terms and Conditions for procurement of clinical and non-clinical goods and services. The NHS Standard Contract is applied to agreements for commissioning healthcare services for our Clinical Commissioning Groups. Both require compliance with relevant legislation.

The staff of North West Anglia NHS Foundation Trust must contact and work with the Procurement department when looking to engage with new suppliers so appropriate checks can be undertaken.

Where it is verified that a subcontractor has breached child labour laws or human trafficking, then this subcontractor will be excluded in accordance with Regulation 57 of the Public Contracts Regulation 2015. The Trust will require that the main contractor substitute a new subcontractor.

The majority of the Procurement team upholds the Chartered Institute of Procurement and Supply (CIPS) Code of Professional Conduct. Where members of the Chartered Institute of Procurement and Supply are held or being studied, this is a mandatory membership requirement.

8. BOARD APPROVAL

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

Signed on behalf of the Trust Board:

Rob Hughes
Chairman
28 July 2020

Caroline Walker
Chief Executive
28 July 2020