

Hull University Teaching Hospitals NHS Trust

Modern Slavery Statement

1 April 2018 to 31 March 2019

1. Introduction

With the Government spend on modern slavery increasing year-on-year (estimated at around £39 million in 2017/18 and £61 million in 2018/19)¹, it is important that organisations continue to support the Government's Modern Slavery Strategy, by taking steps to ensure that modern slavery (i.e. slavery and human trafficking) is not taking place in any part of its own business or supply chains.

2. Statement

This statement sets out the steps that Hull University Teaching Hospitals NHS Trust has taken over the financial year 1 April 2018 to 31 March 2019 to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains.

The statement covers the following:

- Organisational structure, business and supply chains
- Policies in relation to slavery and human trafficking
- Due diligence in our business and supply chains
- Assessing and managing risks in our business and supply chains
- Performance indicators
- Training in slavery and human trafficking

2.1 Organisational Structure, Business and Supply Chains

2.1.1 Organisational Structure and Business

On 1 March 2019, Hull and East Yorkshire Hospitals NHS Trust changed its name to Hull University Teaching Hospitals NHS Trust.

The organisation is a large acute NHS Trust situated in Kingston upon Hull and the East Riding of Yorkshire. The Trust employs just over 7,000 whole time equivalent staff and has an annual income of circa £560 million and has two main sites; Hull Royal Infirmary and Castle Hill Hospital. Outpatient services are also delivered from locations across the local health economy area.

The Trust's organisational structures are available on the Trust's internet site <https://www.hey.nhs.uk/downloads/structure/>.

Further details regarding the Trust's business is provided in the Annual Report and Accounts 2018/19 which is available on the Trust's internet site <https://www.hey.nhs.uk/about-us/corporate-documents/>.

2.1.2 Supply Chains

The Trust's Procurement and Supplies Department is responsible for spending £120m non-pay which includes:

- £28m through the Supply Chain;
- £55m from goods ordered directly (not Supply Chain) through goods and service maintenance contracts;

¹ 2018 UK Annual Report on Modern Slavery
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/749346/2018_UK_Annual_Report_on_Modern_Slavery.pdf

- £37m on other contracts, for example; car park and security, transport and all other service type contracts.

It must be noted that these figures are approximate and will fluctuate year on year.

2.2 Policies in Relation to Slavery and Human Trafficking

As detailed in the Trust's previous Modern Slavery Statement (from 1 April 2017 to 31 March 2018), Trust policies are subject to a thorough consultation and ratification process with input from staff side and management representatives, prior to being published on the Trust's intranet site.

Trust policies are available to staff via the Trust's intranet and are available to the public through a Freedom of Information request. The Trust continues to be committed to reviewing policies on a regular basis and in line with changes to legislation.

The Trust has a number of internal policies and procedures in place (shown below) to help safeguard against modern slavery. The relevant departments will continue to review these as appropriate and ensure that modern slavery is referenced where appropriate.

2.2.1 General Policies

Raising Concerns at Work (Whistleblowing) Policy

The policy, which provides staff with information about how to raise concerns about dangerous or illegal activity in the Trust, was updated in August 2018 to include information regarding the Whistleblowers Support Scheme which the Trust is supporting. The scheme supports current and former NHS staff who are having difficulty finding employment as a result of raising concerns about safety, risk, malpractice or wrongdoing at work.

Risk Policy and Procedures

This policy was updated in September 2018. The policy sets out the arrangements in place to ensure that risk is managed in a systematic and co-ordinated way. All risks and issues are recorded on DATIX and categorised within the risk register as such (risk or issue).

Health and Safety at Work Policy

This policy states that contractors are expected to conform to the relevant health, safety and welfare statutory requirements including giving due attention to any Codes of Practice and / or appropriate Guidance Notes issued by the HSAC / HSE or other authoritative bodies. This includes the Trust's own safety policies and procedures.

2.2.2 Recruitment Policies

Recruitment and Selection Policy (excluding Medical and Dental Staff)

This policy provides staff with the assurance that the Trust is devoted to preventing slavery and human trafficking in its corporate activities, this includes due diligence with regard to recruitment and selection, in which the Trust adheres to the National NHS Employment Checks Standards, which includes vigilant pre-employment screening.

Recruitment and Selection - Medical and Dental Consultant Staff

This policy is currently undergoing review and will be published in due course, following the consultation and ratification processes.

Pre-Employment Checks Policy (incorporates Criminal Record Checking Policy)

This policy provides a framework for the effective management of pre-employment checks required for the appointment of employees and engagement of agency, volunteer and honorary staff. The policy provides further detail of the NHS Employment Checks Standards and confirms that no person shall commence employment or be engaged in a role without the required checks taking place.

Engaging Temporary Workers (Bank and Agency) Policy

This policy details the process for employing agency workers and reinforces that these individuals comply with the standard NHS Employment checks.

2.2.3 Safeguarding Policies

The Trust continues to publish a broad range of policies relating to safeguarding, which were detailed in the previous statement. In addition to these, the Trust's Modern Slavery intranet page includes a number of factsheets on the following:

- Child slavery
- Domestic servitude
- Sexual exploitation
- Forced labour
- Forced marriage
- Forced marriage
- Modern slavery guidance
- National referral mechanism
- Modern slavery pathway

2.3 Due Diligence Processes in the Trust's Business and Supply Chains

2.3.1 Business

The Trust continues to be committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. The Trust also has a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (working hours etc.), health and safety, human rights laws and international standards are adhered to.

All employees; staff transferred into the Trust; doctors in training; volunteers (including students and trainees on work experience placement); agency staff, contracted out staff and other people accessing the Trust in an official capacity, e.g. those involved in the Patient Advocacy and Liaison Service (PALS), and those subject to an honorary contract, are subject to the necessary pre-employment checks in line with the NHS Employment Checks Standards, which verifies that an individual meets the preconditions of the role they are applying for.

All active agencies who supply ODP's and Nurses to the Trust are asked to provide assurance that they are compliant with the Modern Slavery Act 2015 on an annual basis.

2.3.2 Supply Chains

The Trust continues to expect that the supply chains it works with to have suitable anti-slavery and human trafficking policies and processes in place.

To assist with this, the Procurement Department has embedded reference to the Modern Slavery Act in the Selected Questionnaire document, tender document and quotation document.

A central database has been set up in order to record and monitor the responses provided regarding modern slavery on the aforementioned documentation.

Since the amendments to the Selected Questionnaire document, tender document and quotation document, the Trust has awarded ten contracts to suppliers who are compliant with the Modern Slavery Act.

The Facilities Department has also put a process in place to monitor which of their suppliers are compliant with the Modern Slavery Act 2015.

Facilities have identified 30 suppliers, and out of these:

- 22 organisations have shared their modern slavery statement
- 6 organisations do not meet the requirement to produce an annual modern slavery statement (i.e. annual turnover is below £36m)
- 2 organisations have not yet provided their statement; however the Facilities team will continue to try and obtain these.

Transport services, which has recently moved under the Facilities department, will be included in the above process and therefore Facilities will report on these in the 2019/2020 statement.

2.4 Assessing and Managing Risks in our Business/Supply Chains

In terms of assessing the risk of trafficking and slavery within our business and supply chains, as detailed in the sections above, the Trust has a number of measures in place to safeguard against these.

Within our business; we acknowledge that with over 7000 whole time equivalent staff and contact with circa 1 million patients per year (through outpatient appointments, inpatient stays, day cases, attendances at the Emergency Department and ward attendances), there will continue to be the risk of slavery and human trafficking.

However within the Trust's business the following will continue to safeguard the Trust against slavery and human trafficking:

- All staff are employed on employment contracts which comply with UK law.
- All employees including those transferred into the Trust and doctors in training; volunteers (including students and trainees on work experience); agency staff, contracted out staff and other people accessing the Trust in an official capacity, e.g. those involved in the Patient Advocacy and Liaison Service (PALS), and those subject to an honorary contract undergo pre-employment checks.
- All Trust staff undertake mandatory safeguarding training, which covers modern slavery. There are no current plans to undertake any standalone sessions focussing purely on modern slavery, but the eLearning packages are available should staff wish to refresh their knowledge in this subject.
- Across the Trust there are Safeguarding Champions, who provide individuals with an understanding of the fundamentals for good safeguarding (which includes modern slavery and human trafficking). The Safeguarding Champions ensure consistency of expertise in all teams, act as a role model in the workplace, provide information in order for staff to identify people at risk of harm and take action and ensure documentation is completed correctly, accurately, timely and forwarded to the right place.
- In December 2018, the Trust's Modern Day Slavery pathway was published on the Trust intranet.
- Staff have a number of avenues in which they can raise concerns, e.g. via the Freedom to Speak up Guardian etc.
- Within Patient Experience, any suspicion regarding modern slavery or trafficking is escalated to management and reported.

Within the Trust's supply chains, updates to the Selected Questionnaire document, tender document and quotation document to include reference to the Modern Slavery Act 2015, reduces the risk of the Trust using suppliers who are non-compliant.

There is a higher risk of non-compliance when goods and services are procured outside of the tendering process. However these are subject to the Purchase Order Version of the

Terms and Conditions for both goods and services (January 2018) Reference is made in the version to slavery although not specifically to the Act. No further update of the Terms and Conditions has been issued since January 2018. An extract is provided below:

- 1.1.1 it shall: (i) comply with all relevant Law and Guidance and shall use Good Industry Practice to ensure that there is no slavery or human trafficking in its supply chains; and (ii) notify the Authority immediately if it becomes aware of any actual or suspected incidents of slavery or human trafficking in its supply chains;
- 1.1.2 it shall at all times conduct its business in a manner that is consistent with any anti-slavery Policy of the Authority and shall provide to the Authority any reports or other information that the Authority may request as evidence of the Supplier's compliance with this Clause 10.1.22 and/or as may be requested or otherwise required by the Authority in accordance with its anti-slavery Policy;

The Trust will continue to review its major suppliers, with a view to obtaining their ongoing commitment to compliance with the Act.

2.5 Performance Indicators

Compliance with the Trust's modern slavery agenda is measured via the following:

- All staff are required to complete mandatory safeguarding training (which includes modern slavery). As of March 2019, in excess of 90% of Trust staff are compliant with the required training.
- Relevant departments (e.g. Procurement, Facilities etc.) ask suppliers to provide assurance that they are compliant with the Modern Slavery Act 2015.
- All staff undergo the relevant pre-employment checks.
- Any modern slavery concerns are raised through the Trust's incident reporting system (DATIX) and referred to the Safeguarding Team for investigation. From 1 April 2018 to 31 March 2019, there were 5 referrals relating to modern slavery compared to 4 referrals in the previous year (1 April 2017 to 31 March 2018).

2.6 Training in Modern Slavery and Human Trafficking

As stated in section 2.5, staff undertake modern slavery training as part of their mandatory Safeguarding training.

In addition, the Trust also provides a 'Modern Slavery and Human Trafficking' voluntary eLearning module to help frontline healthcare staff identify and support victims of human trafficking. Promotion of this additional training will take place as part of the awareness-raising programme (see Action Plan for timescales).

Modern Slavery is also embedded into other relevant training programmes including Recruitment and Selection.

The Trust's Modern Slavery Working Group also intends to run a modern slavery event in 2019 to further staff education and raise awareness.

3. Summary and Next Steps

Since the requirement for organisations to produce an annual Modern Slavery Statement, the Trust has continued to demonstrate an ongoing commitment to preventing slavery and human trafficking in any part of our business or supply chains.

The Trust's Action Plan (in Appendix 2) details the steps that the Trust will take to continue to educate staff on the importance of preventing modern slavery and to meet the obligations under the national modern slavery agenda.

This will continue to be developed on an ongoing basis in light of any national changes or issues.

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



Signed

Mr Terry Moran
Chairman

Dated

14 May 2019



Signed

Mr Chris Long
Chief Executive

Dated

14 May 2019