

HULL AND EAST YORKSHIRE HOSPITALS NHS TRUST

**MODERN SLAVERY STATEMENT
TRUST SUBMISSION 2017-18**

Trust Board date	15 May 2018	Reference Number	2018 – 5 - 18		
Director	Simon Nearney – Director of Workforce and OD	Author	Sarah Dolby - HR Advisor - Employment Policy and		
Reason for the report	To share the Modern Slavery Statement 2017-18 for Board agreement and to update the Board on the steps the Trust has taken, and planned for next year, to make further progress in this area				
Type of report	Concept paper		Strategic options		Business case
	Performance		Information		Review
					✓

1	RECOMMENDATIONS The Trust Board is asked to approve the attached Modern Slavery Statement for 2017-18, and for its publication the Trust's website and inclusion in the annual report				
2	KEY PURPOSE:				
	Decision		Approval	✓	Discussion
	Information		Assurance		Delegation
3	STRATEGIC GOALS:				
	Honest, caring and accountable culture				✓
	Valued, skilled and sufficient staff				
	High quality care				✓
	Great local services				
	Great specialist services				
	Partnership and integrated services				
	Financial sustainability				
4	LINKED TO:				
	CQC Regulation(s): W2 - governance				
	Assurance Framework Ref: N/A	Raises Equalities Issues? N	Legal advice taken? N	Raises sustainability issues? N	
5	BOARD/BOARD COMMITTEE REVIEW The Trust Board is required to sign a Modern Slavery Statement annually and to publish this on the website and from this year, to include it in its annual report.				

Hull and East Yorkshire Hospitals NHS Trust

Modern Slavery Statement Trust Submission 2017-18

1 PURPOSE

The purpose of this paper is to share the Modern Slavery Statement for the financial year 2017/2018 and also to inform the Trust Board about what steps the Trust has taken this year in order to make further progress towards meeting the obligations of the Modern Slavery Act 2015.

2 BACKGROUND

Following the introduction of the Modern Slavery Act in 2015, there is a statutory requirement for the Trust to produce an annual statement describing what steps have or are being taken to tackle modern slavery (or state that no action has been taken if this is the case).

The expectation is that the Trust builds on the statements year on year, in order for the statements to evolve and improve over time.

Previously there has been no precise detail of what should be covered within the Modern Slavery Statement. However, in Autumn 2017, the Home Office published guidance which recommends that organisations report on the following six areas of activity:

1. Organisational structure and supply chains
2. Organisational policies
3. Assessing and managing risk
4. Due Diligence
5. Performance Indicators
6. Training

The Home Office guidance was supported by an independent report produced by Ergon¹ in April 2017.

Based on the revised guidance, the Trust's 2017/2018 Modern Slavery Statement provides more information on the six areas above.

The Trust's past Modern Slavery Statements are published on the Hull and East Yorkshire Hospitals NHS Trust internet site (under 'Corporate Documents', 'Other Documents').

3 THE PROPOSED STATEMENT FOR 2017/2018

The proposed Statement (see Appendix 1) is attached stage. This has been reviewed by the Workforce Transformation Committee and Modern Slavery Working Group as a draft.

The Action Plan (see Appendix 2) is provided as an update for the Board on ongoing activities in order for the Trust to meet our obligations under the Modern Slavery Act 2015. The Action Plan will continue to evolve over time as our knowledge in this area grows. The Steering Group will use the Action Plan to track any ongoing work that is taking place in relation to modern slavery and also use it to highlight where there are currently gaps that could be improved upon.

¹ 'Modern slavery statements: One year on' <http://ergonassociates.net/>

The formal Statement needs to be approved and signed by the Trust Board, and must be published within six months of the end of the financial year on the Trust's website with a link in a prominent place on the homepage. The 2017/2018 Statement will also be included in the Trust's 2017/2018 Annual Report.

4 RECOMMENDATION

The Trust Board is asked to approve the attached Modern Slavery Statement for 2017-18, and for its publication the Trust's website and inclusion in the annual report

Sarah Dolby
HR Advisor - Employment Policy and Resourcing

Simon Nearney
Director of Workforce and Organisational Development

May 2018

HULL AND EAST YORKSHIRE HOSPITALS NHS TRUST

MODERN SLAVERY STATEMENT FOR THE FINANCIAL YEAR 1 APRIL 2017 TO 31 MARCH 2018

1. **Introduction**

This statement sets out the steps that the Hull and East Yorkshire Hospitals NHS Trust have taken for the financial year; 1 April 2017 to 31 March 2018, 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. **Organisational Structure and Supply Chains**

Hull and East Yorkshire Hospitals NHS Trust is a large acute Trust situated in Kingston upon Hull and the East Riding of Yorkshire.

The Trust employs just over 8000 staff, has an annual turnover of over £500m 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/download/structure/> for the:

- Board Committee Structure
- Executive Management Committee Structure
- Executive Structure
- Health Group Structure

2.1 **Supplies and Procurement Department**

The Supplies and Procurement Department is made up of the Stock Purchasing Team (NHS Supply Chain), Non-Stock Purchasing Team (Buyers), Contracts Team and Stores Team.

The overall aim of the Supplies and Procurement Department is to reduce costs and ensure all goods and services are covered by a robust cost effective contract, whilst adhering to the Trust's 'Standing Orders, Reservation and Delegation of Powers and Standing Financial Instructions²'.

The 'Standing Orders, Reservation and Delegation of Powers and Standing Financial Instructions' regulate the way in which the proceedings and business of the Trust are conducted and summarise the requirements in relation to tenders and quotations, as below:

Value of Goods/Services	Tender/quotation requirement
Less than £10k (including VAT)	Use NHS supply chain and established contracts where possible otherwise obtain a quotation
Between £10k and up to £50k (including VAT)	Obtain a quotation
£50k to £106k (including VAT)	Undertake a local tender exercise
More than £118,133k (including VAT)	Tender exercise using EU procurement procedures

² Standing Orders and Standing Financial Instructions, <https://www.hey.nhs.uk/about-us/corporate-documents/>

The Trust currently purchases approximately £27m worth of stock from NHS Supply Chain³ on an annual basis. As NHS Supply Chain provides healthcare products and supply chain services to the NHS as a whole, they have a robust code of conduct which they expect their suppliers to adhere to. The code of conduct states that all of the NHS Supply Chain's suppliers should support the principles of the United Nations' Global Compact, UN Universal Declaration of Human Rights as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national law and practice.

In addition to the code of conduct, NHS Supply Chain published their approach to ensuring their suppliers are compliant with the Modern Slavery Act 2015 in October 2016⁴.

The Trust spends approximately £55m per year on non-stock products (i.e. not ordered through NHS Supply Chain), which are managed by the Non-Stock Purchasing Team (Buyers). The team are responsible for ensuring that goods are ordered against agreed contracts.

The Contracts Team are responsible for ensuring that the correct contracts are in place to obtain goods and services at competitive prices for the Trust in line with the 'Standing Orders, Reservation and Delegation of Powers and Standing Financial Instructions' and other relevant current legislation.

The tendering process within the Trust requires organisations to complete a 'Selection Questionnaire (SQ)'. Following the introduction of the requirements under the Modern Slavery Act 2015, the SQ documentation has been updated to include the following:

Section 7: Modern Slavery Act 2015: Requirements under Modern Slavery Act 2015

Question	Response
7.1 Are you a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?	Yes <input type="checkbox"/> N/A <input type="checkbox"/>
7.2 If you have answered yes to question 7.1 are you compliant with the annual reporting requirements contained within Section 54 of the Act 2015?	Yes <input type="checkbox"/> Please provide the relevant url ... No <input type="checkbox"/> Please provide an explanation

The tender documentation also requires external companies to submit contingency plans, covering a range of issues, so that in an event of a failure there is a plan in place. The Trust scores contingency plans and this becomes part of the overall decision as to whether a tender is accepted. The Trust will review whether any provisions can be added into contingency plans relating to modern slavery (see Action Plan for timescales).

The Trust is currently putting a process in place to quantify the number of organisations that, through the tender documentation, state they are compliant with the Modern Slavery Act 2015. The Trust intends to have this set up in order that this can be reported on in the Trust's 2018/2019 Modern Slavery Statement.

³ <https://www.supplychain.nhs.uk/about-us/what-we-do/>

⁴ The UK Modern Slavery Act 2015, Monday 17 October 2016, <https://www.supplychain.nhs.uk/news/company/the-uk-modern-slavery-act-2015/>

As stated above, the Trust undertakes a huge amount of business with suppliers providing goods or services. Where possible the Trust has robust processes in place to ensure that the external companies used are compliant with current legislation. However, the Trust recognises that where orders are placed outside the tendering process, there is an increased risk that the companies providing goods or services are not compliant with the Modern Slavery Act 2015.

That being said, for all orders placed outside the tendering process, a 'Purchase Order' is completed and sent to the external company. The conditions of the 'Purchase Order' state: "Where no valid agreement exists for the items listed above the following NHS Terms and Conditions shall prevail (as applicable):

- NHS Terms and Conditions for the Supply of Good (Purchase Order Version) or NHS Terms and Conditions for the Provision of Services (Purchase Order Version)."

The Trust is in the process of exploring whether the above conditions include reference to Modern Slavery (see Action Plan for timescales).

3. Organisational Policies

Trust policies are subject to a thorough consultation process, which involves new and amended policies being discussed at relevant committees/groups, for example, the Trust's Policy Sub Group, (which is attended by a mix of staff side and management side representatives both medical and non-medical). Policies then go through a ratification process prior to being published on the Trust's intranet site.

All 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 is 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, and will continue to review these as appropriate and ensure that modern slavery is referenced where appropriate.

3.1 General Policies

Raising Concerns at Work (Whistleblowing) Policy

This policy provides staff with information about how to raise concerns about dangerous or illegal activity in the Trust. There are legal protections built in to whistleblowing to encourage staff to speak up without repercussions on their employment.

To support this policy, a flowchart outlining 'How to Raise Concerns' was developed and published on the Trust's intranet in 2017. The document provides an overview of the different means in which a person can raise a concern about patient safety or staff welfare.

Risk Policy and Procedures

Effective risk management is the foundation on which the Trust delivers its objectives. It is the key system through which all risks; clinical, organisational and financial risks, are managed to ensure benefits to patients, staff, visitors and other stakeholders. This policy describes how staff will fulfil their role in risk assessment and the production of risk registers. All risks regardless of nature or origin will be managed via this process.

The policy provides employees with information on how to identify risks, assess their relative importance, determines the appropriate risk control mechanism and most importantly, ensures that the agreed action is taken. The Trust has a legal requirement to give assurance that risks in the organisation are identified and appropriately managed.

3.2 Recruitment Policies

Recruitment and Selection Policy (excluding Medical and Dental Staff)

The purpose of this policy is to promote the Trust as an employer of choice, and maintain a framework of fair, efficient and cost effective recruitment and selection procedures that are compliant with relevant legislation.

The 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 and that 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 designed to ensure that there is a consistent approach to recruitment, selection and the appointment of Consultants, ensuring that they are recruited in a way that:

- Is free from unlawful bias
- Is compliant with relevant legislation
- Ensures that candidates demonstrate values shared by the Trust
- They demonstrate evidence of their compliance with the 4 domains of the General Medical Council's Good Medical Practice
- Portrays the Trust in a positive and professional manner
- Reflects the Trust's commitment to equality and diversity and flexible working practices

The policy also confirms that the Trust adheres to the National NHS Employment Checks Standards.

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

Following the publication of the NHS Improvement (NHSI) Agency Rules in March 2016⁵, the Trust developed this policy to set out the expectations, roles and responsibilities that must be adhered to for authorising, sourcing, booking and paying temporary workers.

Within the Agency Rules, NHSI reminded trusts of their ultimate responsibility to ensure all agency workers engaged in employment at their organisation comply with the standard NHS Employment checks. The Trust's policy complies with this.

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.

⁵ NHS Improvement Agency Rules, March 2016

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/510391/agency_rules_23_March_2016.pdf

3.3 Safeguarding Policies

The NHS has a broad range of policies relating to Safeguarding. The policies provide guidance to staff on recognising the signs of modern slavery and provide advice on what to do in such cases:

- Chaperone Policy
- Guidance on the Medical Assessment of Children with Concerns of Neglect Guideline
- Investigation and management of children who have been sexually abused
- Management of Female Genital Mutilation (FGM) Policy
- Managing Allegations against Staff (Children and Adults) Policy
- Patient Visitors Guidelines
- Safeguarding Children - Court Statements Guideline
- Safeguarding Children - Escalation of Concerns Guideline
- Safeguarding Children - In Whom Illness is Fabricated or Induced Guideline
- Safeguarding Children - Management of Children and Young People who Do Not Attend (DNACancel) their Appointment Guideline
- Safeguarding Children – Managing Allegations or Concerns Against Staff Guideline
- Safeguarding Children and Adults Supervision Policy
- Safeguarding Children Policy
- Safeguarding of Adults at Risk Policy

The Trust has strengthened its safeguarding arrangements for adults and children, with the Trust's regulator and commissioners confirming that good assurance is received from the Trust in this area. This route is starting to be used to raise and report concerns regarding modern slavery identified by Trust staff.

4. Assessing and Managing Risk

4.1 Due Diligence

The Trust is 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.

4.1.1 Recruitment

The Trust adheres to the National NHS Employment Checks Standards, which among others includes pre-employment checking which seek to verify that an individual meets the preconditions of the role they are applying for.

4.1.2 Supply Chains

The Trust expects that the supply chains it works with have suitable anti-slavery and human trafficking policies and processes in place, and where possible this has now been built into key documentation e.g. tender documentation.

Throughout 2017 and continuing into 2018, areas within the Trust have continued to extend a significant amount of effort into requesting affirmation from suppliers that they comply with the Modern Slavery Act 2015. The Trust is exploring how this information can be captured in a central location.

There are 14 active agencies who supply ODPs and Nurses to the Trust as and when required. Over the past year the Trust has contacted all 14 agencies to obtain assurance that they are compliant with the Modern Slavery Act 2015. The Trust will continue to chase responses.

A process for receiving assurances from suppliers used within the Estates, Facilities and Development Directorate has been established to ensure the Trust can report on this in the 2018/2019 statement.

4.1.3 Incident Reporting

The Trust has a robust incident reporting system, managed by the Risk Team, where modern slavery concerns can be raised, which are then brought to the attention of the Safeguarding Team. The Safeguarding Team will then investigate the concern and determine whether a safeguarding alert should be made against the appropriate organisation. During 2016 the importance of having a robust reporting system was reaffirmed, when a human trafficking concern was raised and passed onto the safeguarding team, who followed up and dealt with the concern as required.

From 1 April 2017 to 31 March 2018, within the Trust there were 4 safeguarding concerns reported and followed up on as appropriate.

4.1.4 Training

In April 2015 Modern Slavery was embedded into the Trust's mandatory Safeguarding training for all staff, which forms part of the Trust's key performance indicators.

As of March 2018 in excess of 90% of Trust staff are compliant with the required 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.

4.1.5 Awareness-Raising Programme

Following the obligation to produce the modern slavery annual statement, a Steering Group formed within the Trust, made up of key colleagues who represent the areas where there are potential links to modern slavery (HR/Procurement/Risk/Facilities/Training). The Steering Group facilitates the work that needs to be undertaken to ensure that the Trust is meeting its obligations under the Modern Slavery Act 2015. The Steering Group also reviews and updates this modern slavery statement on an annual basis and identifies new actions to further embed the requirements of the Modern Slavery Act 2015 in the Trust.

There is also a local partnership working group in place to specifically look at the processes for referral, led by the Safeguarding Adult Board and in which the Trust is represented.

Safeguarding Champions have been identified across the Trust, which provides 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.

Information relating to modern slavery has been included in Trust communications on four occasions over the past year to help raise awareness.

Due to changes in staffing which impacted on the Steering Group and resource issues, the planned awareness campaign in 2017 was postponed. The Group however, plan to hold the campaign in 2018.

4.2 Risks

Whilst due diligence shows that the Trust has a number of robust steps on place to safeguard against modern slavery, there continues to be a range of risks associated with modern slavery.

For example:

- Due to resourcing issues, the Trust is unable to contact every past supplier of goods or services to request that they are compliant with the Modern Slavery Act 2015. However, processes are either in place or being set up to obtain and record this information e.g. through the inclusion of the modern slavery section in the 'Selection Questionnaire'.
- Although the Trust provides training to staff on modern slavery and there are clear pathways to follow when a safeguarding issue is identified, the Trust cannot be assured that every single staff member would feel empowered and confident to recognise the signs of modern slavery and raise the concern. However, as stated in section 3.1, a human trafficking concern was raised in 2016 through the Trust's Patient Advice and Liaison Service (PALS). In addition to this, when a query regarding a tender came up in relation to modern slavery, the staff member knew who to contact (i.e. Modern Slavery Group) to clarify some information received. Therefore whilst, there is still room to improve on raising awareness of modern slavery within the Trust, there are examples where non clinical staff have recognised and raised a concern.
- Some of the Trust's key policies that have links to modern slavery, do not always reference modern slavery clearly, if at all. Therefore the Modern Slavery Steering Group will review which policies need to include more information relating to modern slavery and work with the relevant departments to update them (see Action Plan for timescales).

The Action Plan in Appendix 1 identifies the steps that need to be taken, in order for the Trust to continue to raise awareness of the modern slavery agenda.

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



Signed _____
Mr Terry Moran
Chairman



Signed _____
Mr Chris Long
Chief Executive

Dated 15.05.18

Dated 15.05.18

APPENDIX 2

**MODERN SLAVERY ACTION PLAN
UPDATED APRIL 2018**

OPEN ACTIONS:

Date Raised	Description	Owner	Comments	Due Date
August 2016	Obtain assurances from main suppliers/agencies etc. that they comply with the Modern Slavery Act 2015	ALL	<ul style="list-style-type: none"> Agencies supplying ODPs / Nurses to the Trust have been contacted. Outstanding responses have been chased. Suppliers within Estates and Facilities have been contacted and outstanding responses are being chased. 	Review at each meeting
April 2018	Identify contacts within Capital Development, Medical Staffing and Workforce Planning to assist with obtaining assurances from suppliers	ALL	<ul style="list-style-type: none"> Engaging temporary workers – is modern slavery part of the framework agreement? 	Review at each meeting
December 2016	Compile list of responses received from suppliers/agencies and create mechanism for annual review	ALL	<ul style="list-style-type: none"> Currently all statements of assurance received have been saved electronically within individual departments. Review how this can be stored centrally. 	Review at each meeting June 2018
April 2018	Review Trust corporate policies and include references to modern slavery where appropriate	ALL	<ul style="list-style-type: none"> Review list in June 2018 meeting. SD to lead on contacting relevant departments to update policies as appropriate. 	March 2019
April 2018	Awareness-Raising Programme	ALL	<ul style="list-style-type: none"> SD to engage with Communications team. Review progress with JP re posters. Group to arrange campaign. Review Modern Slavery Steering Group attendees and identify other areas to engage with e.g. risk. Promote voluntary modern slavery e-learning as part of the awareness-raising programme. 	March 2019
February 2017	Modern slavery training	JP/BG	<ul style="list-style-type: none"> Review safeguarding presentation – update required SP for the children’s safeguarding training. 	Review at June 2018

Date Raised	Description	Owner	Comments	Due Date
			<ul style="list-style-type: none"> Review whether links to Salvation Army modern slavery training are available following a period of being offline. If live, add to HEY247. 	meeting
April 2018	<p>Supplies and Procurement:</p> <ul style="list-style-type: none"> Identify a volunteer to take part in the Modern Slavery Steering Group Review whether any provisions can be added into contingency plans Set up process to quantify the number of organisations that, through the tender documentation, state they are compliant with the Modern Slavery Act 2015 Review whether the NHS Terms and Conditions for the Supply of Good (Purchase Order Version) or NHS Terms and Conditions for the Provision of Services (Purchase Order Version) include reference to Modern Slavery 	JL		Review at June 2018 meeting
Dec 2016	Link in with Modern Day Slavery Pathway for Hull and Wilberforce Institute for the study of Slavery and Emancipation	ALL	<ul style="list-style-type: none"> Consider how the Trust can work in partnership with relevant agencies. 	Review at June 2018 meeting
February 2017	Action Plan to be shared with WTC/Diversity and Inclusion Steering Group quarterly	SD	<ul style="list-style-type: none"> Share in April 2018, July 2018, October 2018, January 2019. 	Ongoing

COMPLETED ACTIONS:

Date Raised	Description	Owner	Comments	Due Date
August 2016	All new nursing agencies will be asked for assurance at the point they supply staff to the Trust	JB	<ul style="list-style-type: none"> Process has been set up to do this as and when required 	Closed
December 2016	Set up shared folder	SD		Closed
August 2016	Update Recruitment and Selection training (incl. overview of modern slavery/key contacts)	SD	<ul style="list-style-type: none"> Updated December 2016 	Closed
August 2016	Review the process for changing bank details in ESR (re could staff be forced to change bank details?)	SD	<ul style="list-style-type: none"> ESR self-service allows staff to change bank details electronically without notifying payroll Agreed that this can be dealt with through raising awareness of modern slavery 	Closed
December 2016	Put up posters around the Trust to raise awareness	ZD/JP	<ul style="list-style-type: none"> Posters have been put up in key areas (nursing, PALS etc.) 	Closed
February 2017	Modern slavery training	ZD/JP/BG	<ul style="list-style-type: none"> Midwives now have a one hour mandatory training session on modern slavery Review safeguarding presentation – all Safeguarding Adults Training has been reviewed and includes references to Modern Slavery The new 'Modern Slavery and Human Trafficking' eLearning course is now available on HEY247 	Closed Closed Closed
December 2016	Update Trust's Safeguarding intranet	ZD/JP	<ul style="list-style-type: none"> Key contacts updated including police contact 	Closed
August 2016	Supplies to amend Pre-Qualification Questionnaire	TBC	<ul style="list-style-type: none"> SD to chase Supplies for update and ask for volunteer to attend meetings – the PQQ has been updated (section 7) to include: <ul style="list-style-type: none"> “Are you a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act")?” 	Closed

			<ul style="list-style-type: none"> – “If you have answered yes to question 7.1 are you compliant with the annual reporting requirements contained within Section 54 of the Act 2015?” 	
August 2016	Agree Modern Slavery Statement for 2016/2017 to national timescales and monitor ongoing work being done nationally	All	<ul style="list-style-type: none"> • 2016/2017 Statement to be produced by the end of June 2017. Statement approved in May 2017 and will be published on the Trust internet site (under Corporate Documents) and will also be contained within Trust’s Annual Report 	Closed
August 2016	Raising awareness re Modern slavery.	SD/JP/ZD/BG	<ul style="list-style-type: none"> • Comms on a monthly/quarterly basis for eNews (incl. sharing Salvation Army modern slavery training) – Articles on modern slavery have appeared in Trust comms in April 2017, May 2017, August 2017 and September 2017 • Share Flex newsletter with group 	Ongoing
December 2016	Arrange awareness campaign	All	<ul style="list-style-type: none"> • Confirm availability of planned training dates • Additional meeting to be arranged to organise campaign asap 	Closed – will be reopened in 2018
February 2017	Undertake further work in its supply chain, to identify and understand any significant risks	All	<ul style="list-style-type: none"> • Supplies to work with the Steering Group 	Closed
December 2016	Obtain assurance from Hand Car Wash who clean Trust vehicles	AM	<ul style="list-style-type: none"> • The Trust Property Manager has confirmed that the hand car wash situated on Anlaby Road is privately run on private land and therefore has no connection with the Trust, although they have provided assurance by email. 	Closed
December 2016	Modern slavery concern raised by Patient Experience	SD		Closed
August 2017	Letter from Siemens asking the Trust for assurance that obligations are met in accordance with the Modern Slavery Act 2015	SD/JL/DS	<ul style="list-style-type: none"> • Signed letter returned to Siemens 	Closed