

## Hull University Teaching Hospitals NHS Trust

### Modern Slavery Statement 1 April 2020 to 31 March 2021

#### 1. Introduction

The Modern Slavery Act 2015 requires organisations to publish an annual Modern Slavery Statement on their website within six months of the end of the financial year (i.e. for the Trust this would require the statement to be published by 30 September).

The Trust is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

#### 2. Background

According to Antislavery.org<sup>1</sup> the number of people identified as victims of modern slavery has been rising year on year, with over 10,000 people referred to authorities in 2019. The real number of people trapped in slavery is estimated to be much higher.

Due to the COVID-19 pandemic, the Government advised that victims of modern slavery may be even more isolated and hidden from view during the coronavirus outbreak.

It is therefore important that organisations have remained cognisant of this throughout the pandemic and continue to support the Government's Modern Slavery Strategy, by taking steps to ensure that modern slavery is not taking place in any part of its own business or supply chains.

#### 3. Statement

This statement sets out the steps that Hull University Teaching Hospitals NHS Trust has taken over the financial year 1 April 2020 to 31 March 2021 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

#### 3.1 Organisational Structure, Business and Supply Chains

##### 3.1.1 Organisational Structure and Business

Hull University Teaching Hospital NHS Trust is a large acute NHS Trust situated in Kingston upon Hull and the East Riding of Yorkshire. The Trust employs just over 8,400 whole time equivalent staff, has an annual income of circa £726m 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.

Further details regarding the Trust's business is provided in the Annual Report and Accounts 2020/21 which is available on the Trust's internet site <https://www.hey.nhs.uk/about-us/corporate-documents/#annual-report>.

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<sup>1</sup> <https://www.antislavery.org/slavery-today/slavery-uk/>

### **3.1.2 Supply Chains**

The Trust's Procurement and Supplies Department is responsible for spending £125m non-pay which includes:

- £17m through the Supply Chain (compared to £19m in the previous statement);
- £68m from goods ordered directly (not Supply Chain) through goods and service maintenance contracts (compared to £65m in the previous statement);
- £40m on other contracts, for example; car park and security, transport and all other service type contracts (compared to £37m in the previous statement).

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

The Trust does not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

## **3.2 Policies in Relation to Slavery and Human Trafficking**

### **3.2.1 Policies for Staff**

Trust policies for staff 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 in relation to the Modern Slavery Act 2015 are available to staff via the Trust's intranet site and to the public through a Freedom of Information request. These include:

- Raising Concerns at Work (Whistleblowing) Policy
- Equality, Diversity and Inclusion in Employment Policy
- Policy for Staff Conflict Resolution and Professionalism in the Workplace

The Trust continues to be committed to reviewing policies on a regular basis and in line with changes to legislation.

### **3.2.2 Safeguarding Policies**

The Trust continues to publish a broad range of safeguarding policies and factsheets, for both service users and staff, on the Trust intranet which are reviewed as required. The last year has also seen further information being made available via the Safeguarding Team of campaigns to support victims of modern slavery during the COVID-19 pandemic.

New factsheets published on the Trust intranet during the last financial year include:

- What do you see? campaign
- Modern Slavery and trafficking, Guidance for nurses and midwives
- Slavery on Your Doorstep campaign
- Covid-19 Modern Slavery Resources

## **3.3 Due Diligence Processes in the Trust's Business and Supply Chains**

### **3.3.1 Due Diligence in Business**

The Trust is committed to preventing slavery and human trafficking in 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.

The Trust's recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from abuse or coercion.

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

### *3.3.2 Due Diligence in Supply Chains*

The Trust continues to expect that the supply chains it works with have suitable anti-slavery and human trafficking policies and processes in place. All of the Trust tenderers are expected to respond to the question within the Selected Questionnaire document, tender document and quotation document to provide assurance that they adhere to the Modern Slavery Act. A central database has been set up to record this assurance from tenderers.

This year for the first time, the Trust is able to quantify the number of contracts/suppliers who have provided assurance that they adhere to the Modern Slavery Act.

The Trust currently has 571 active contracts/suppliers. 212 (37%) of these have provided confirmation that they do or do not meet the criteria which requires them to produce a Modern Slavery Statement, as follows:

- 161 contracts / suppliers have provided assurance that they are compliant with the requirements of the Modern Slavery Act.
- 51 contracts/suppliers have confirmed that they do not meet the criteria which requires them to complete an annual Modern Slavery Statement (i.e. annual turnover is below £36m). However, the Trust still expects that they conduct their business with due regard to the Modern Slavery Act.

These numbers continue to be monitored. As contracts are renewed, organisations are asked to provide assurance that they adhere to the Modern Slavery Act, therefore the 37% will only increase over time.

## **3.4 Assessing and Managing Risks in our Business/Supply Chains**

The following practices contribute to the Trust managing risks within the organisation's business and supply chains:

### *3.4.1 Assessing and Managing Risks: Staff*

- All staff are employed on employment contracts which comply with UK law.
- Pre-employment checks are undertaken on all workers directly and non-directly employed by the Trust (e.g. employees, Agency staff, contractors, volunteers, students and trainees on work experience etc.).
- All staff undertake mandatory safeguarding training, which covers modern slavery.
- As an equal opportunities employer, the Trust is committed to creating an inclusive working environment for all staff, which enables staff to feel confident that they can raise concerns without any risk to themselves via a number of avenues, e.g. via the Freedom to Speak up Guardian etc.
- A comprehensive range of modern slavery and safeguarding information for service users and staff is available for staff on the Trust intranet.

### *3.4.2 Assessing and Managing Risks: Safeguarding*

- To improve dissemination of safeguarding updates and information, a new model to replace the Safeguarding Champion role (which provides individuals with an understanding of the fundamentals for good safeguarding, including modern slavery and human trafficking) was presented to the Safeguarding Committee. However, due to the current Covid-19 pandemic, the decision of whether this will be implemented has been delayed.
- The Trust continues to have strong links with the Humber Modern Day Slavery Partnership, with representatives from both the Safeguarding Children's Team and Safeguarding Adult's Team sitting as part of a strategic group within the partnership.

- The Trust will continue to evolve and learn and develop new processes to safeguard the organisation and the population it serves against modern slavery.
- For key partners involved in cases of modern slavery, a multi-agency agreement to hold an emergency/short notice strategy meeting with key partner representatives is now in place. Key partners include the Trust's Safeguarding Adults Team, the Local Authority Safeguarding Adults Team, Independent Domestic Violence Advocate/Hull DAP, Domestic Abuse Team, PVP Unit/Humberside Police, the Hospital Social Work Team and the Mental Health Service.
- The Trust will continue to record safeguarding adult concerns on DATIX submitted by staff via the staff intranet (in the last financial year there has been 3 received).
- The Trust will continue to refer safeguarding adult concerns to the Local Authority following quality checking by the Trust Safeguarding Team to ensure compliance with the Care Act, Mental Capacity Act and Consent.
- The Trust will continue to monitor the number of enquiries made to the Safeguarding Adults Team from staff who have disclosures or concerns about modern slavery for one of their patients (in the last financial year there has been 6 queries received).
- Modern slavery concerns and advice are also raised within the Safeguarding Children's Team.

#### **3.4.3 Assessing and Managing Risks: Procurement and Supplies**

- The Trust continues to reduce the risk of modern day slavery occurring within the organisation's supply chains by ensuring the Selected Questionnaire document, tender document and quotation document are up-to-date and continue to request tenderers to provide assurance that they adhere to the Modern Slavery Act 2015.
- Whilst there is more of a risk for non-compliance when goods and services are procured outside of the tendering process, there continues to be robust processes in place to mitigate these risks. All goods purchased outside the tendering process must adhere to the Trust's Standing Financial Instructions and are subject to the Purchase Order Version of the Terms and Conditions for both goods and services (January 2018) which references modern slavery. Also, all purchases where the expenditure is over £10k and less than £50k must have 3 official quotations. Going forward, when requesting information for values lower than the £10k referenced in the Standing Financial Instructions, suppliers are also requested to complete our formal quotation form, which includes reference to modern slavery.
- The Trust will continue to review major suppliers, with a view to obtaining their ongoing commitment to compliance with the Act.

#### **3.5 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 2021, in excess of 87% of Trust staff are compliant with the required training, which is consistent with previous years.
- 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.

#### **3.6 Training in Modern Slavery and Human Trafficking**

The Trust provides mandatory training to all staff on modern slavery via the following courses/eLearning packages:

- Safeguarding Adults
- Safeguarding Children

In addition to the mandatory training, staff can also choose to enrol on the following courses/eLearning packages offered by the Trust:

- Modern Slavery and Human Trafficking
- Introduction to Migration
- Children Vulnerable to Abuse and Exploitation

Modern Slavery is also embedded into other relevant training programmes including Recruitment and Selection. The Safeguarding Teams provide additional ad-hoc training and day to day support around modern slavery when requested.

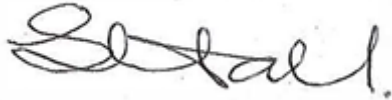
#### 4. Summary

The Trust continues to demonstrate an ongoing commitment to preventing slavery and human trafficking in any part of our business or supply chains. The Trust is committed to:

- Continuing to educate staff on the importance of preventing modern slavery and to meet the obligations under the national modern slavery agenda.
- Monitoring and reviewing ongoing modern slavery legislation and best practice.
- Obtaining assurances from main suppliers/agencies etc. that they comply with the Modern Slavery Act 2015 and record and monitor these as required.
- Reviewing Trust policies and including references to modern slavery where appropriate.

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

Signed



Chairman

Dated

September 2021

Signed



Mr Chris Long  
Chief Executive

Dated

September 2021