

Hull University Teaching Hospitals NHS Trust

Modern Slavery Statement 1 April 2021 to 31 March 2022

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).

With the Home Office² reporting that “12,727 potential victims of modern slavery were referred to the Home Office in 2021”, which is an increase of 20% compared to the previous year, it is imperative that organisations continue to take all the necessary steps to ensure that modern slavery is not taking place in any part of its own business or supply chains.

This statement sets out the steps that Hull University Teaching Hospitals NHS Trust has taken over the financial year 1 April 2021 to 31 March 2022 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 and business
- Policies in relation to slavery and human trafficking
- Due diligence and managing risks in the Trust’s business and supply chains
- Training and performance indicators

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

2. 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 8,300 whole time equivalent staff, has an annual income of circa £794m million and operates over 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 and structure can be found in the Annual Report and Accounts 2021/22, available on the Trust website <https://www.hey.nhs.uk/about-us/corporate-documents/#annual-report>.

3. Policies in Relation to Slavery and Human Trafficking

The Trust has a number of policies to support staff in relation to modern slavery, including

- 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 has also continued to publish a broad range of safeguarding policies and factsheets, for both service users and staff, during the last financial year, which include:

- Modern slavery resources in response to humanitarian crisis in Ukraine.
- Independent Anti-Slavery Commissioner Annual Report 2021-2022.
- How to prevent modern slavery. A report by USEEN UK.
- Covid-19 Modern Slavery Resources.

² <https://www.gov.uk/government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2021/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2021>

Any new campaigns/policies in relation to modern slavery and trafficking are published on the Trust intranet.

All Trust policies go through a robust consultation and ratification process and are available on the Trust's internal website.

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

4.1 Due Diligence in Business

The Trust is committed to preventing slavery and human trafficking in corporate activities and ensuring that workers are not exploited, that they are safe and that relevant employment (working hours etc.), health and safety, human rights laws and international standards are adhered to. To support staff, the following steps are taken:

- 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.
- 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.

From a safeguarding perspective, the Trust continually looks at ways in which staff and service users can be supported and protected from modern slavery and human trafficking. Steps taken to ensure this include:

- After previously being out on hold due to the COVID-19 pandemic, the Safeguarding Champion role will be reviewed and refreshed to improve dissemination of safeguarding updates and information.
- 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 continues to evolve, 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 Safeguarding Children's Team also follow a similar process for children under 18 years of age, who may be potential victims of modern slavery.
- The Trust continues to record safeguarding adult concerns on DATIX submitted by staff via the staff intranet (in the last financial year 5 were received).
- The Trust continues 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 continues 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 6 queries were received).

- The Trust continues to refer all safeguarding children concerns, including those related to modern slavery, to the Local Authority Children's Social Care Services.

4.2 *Due Diligence in Supply Chains*

The Trust's Procurement and Supplies Department is responsible for spending £142m non-pay which includes:

- £28,304,986 through the Supply Chain (compared to £17m in the previous year);
- £70,426,238 from goods ordered directly (not Supply Chain) through goods and service maintenance contracts (compared to £68m in the previous year);
- £44,284,800 on other contracts, for example; car park and security, transport and all other service type contracts (compared to £40m in the previous year).

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

The Trust currently has 1004 active contracts, covered by 455 individual suppliers. Of the 455 individual suppliers, 367 (80%) have provided information in relation to the Modern Slavery Act, as follows:

- 235 contracts/suppliers have provided assurance that they are compliant with the requirements of the Modern Slavery Act, compared to 161 in the previous year.
- 132 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), compared to 51 in the previous reporting period. However, the Trust still expects that they conduct their business with due regard to the Modern Slavery Act.

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. Steps taken to reduce the risk of modern day slavery occurring within the supply chain include:

- Ensuring the Selected Questionnaire document, tender document and quotation document are up-to-date.
- Continue to request tenderers to provide assurance that they adhere to the Modern Slavery Act 2015 and continue to monitor the number of those that are or are not compliant on the department's central database.
- Continue to ensure there are robust processes in place to mitigate risks associated with procuring goods and services outside of the tendering process, including:
 - 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.
 - All purchases where the expenditure is over £10k and less than £50k must have 3 official quotations.
 - Going forwards, when requesting information for values lower than the £10k referenced in the Standing Financial Instructions, suppliers will also be requested to complete the Trust's formal quotation form, which includes reference to modern slavery.
- The Trust continues to review major suppliers, with a view to obtaining their ongoing commitment that they comply with the Modern Slavery Act 2015. As contracts are renewed, organisations will continue to be asked to provide this assurance.

5. Training and Performance Indicators

Compliance with the Trust's modern slavery agenda is measured by reviewing the number of staff who have completed the following mandatory courses/eLearning packages (which include modern slavery):

- Safeguarding Adults
- Safeguarding Children

As of March 2022, in excess of 85% of Trust staff are compliant with the required training, which is consistent with previous years.

In addition to the mandatory training, the Safeguarding Teams provide ad-hoc training and day to day support around modern slavery when requested. Modern slavery is also embedded within other relevant training programmes which staff can choose to enrol on, including but not limited to:

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

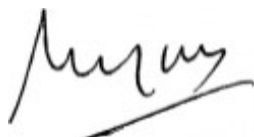
6. Summary

The Trust continues to be committed to preventing slavery and human trafficking in any part of its 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: 13 September 2022

Signed



Mr Chris Long
Chief Executive

Dated: 13 September 2022