

## **Modern Slavery Act 2015 Section 54 – Slavery and Human Trafficking Statement**

Section 54 of the Modern Slavery Act 2015 requires all organisations to set out the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

Buckinghamshire Healthcare NHS Trust (BHT) aims to follow good practice and take all reasonable steps to prevent slavery and human trafficking. We are committed to ensuring that all of our employees are aware of the Modern Slavery Act 2015 and their safeguarding duty to protect and prevent any further harm and abuse when it is identified or suspected that the individual may be or is at risk of modern slavery/human trafficking.

We are committed to ensuring that no modern slavery or human trafficking takes place in any part of our business or our supply chain. This statement sets out actions taken by BHT to understand all potential modern slavery and human trafficking risks and to implement effective systems and controls.

### **Trust Structure and Principle Activities**

BHT is a major provider of integrated hospital and community services for people living in Buckinghamshire and the surrounding area, including Thame (Oxfordshire), Tring (Hertfordshire) and Leighton Buzzard (Bedfordshire), providing care to over half a million patients every year in our hospitals, community settings and people's own homes.

We are recognised nationally for a number of our services that we provide. Stoke Mandeville Hospital is home to the internationally recognised National Spinal Injuries Centre, our stroke service is one of the best in the region and we are a regional centre for burn care, plastic surgery and dermatology.

We are part of the Buckinghamshire Place-based Partnership which is comprised of Buckinghamshire Healthcare NHS Trust, Oxford Health NHS Foundation Trust, South Central Ambulance Service NHS Foundation Trust, FedBucks GP Federation and Buckinghamshire Council. The Trust is also part of the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care System (ICS) and works closely with the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (ICB).

We procure goods and services from a range of providers. Contracts vary from small one-off purchases to large service contracts. All spend, aside from a few exceptions such as rates, is paid via Purchase Order (PO). The Applicable Contract Terms Policy applies to any NHS organisation and states that where an NHS body issues a PO the standard Terms & Conditions apply.

## **Organisational policies in relation to slavery and human trafficking**

BHT has internal policies and procedures in place that assess supplier risk in relation to the potential for modern slavery or human trafficking.

The BHT Safeguarding Adult and Children Policy includes information on modern day slavery/human trafficking.

The BHT Incident Reporting Policy states that colleagues should report incidents of all types and this includes concerns regarding modern slavery and human trafficking. By using the local risk management system (Datix) appropriate teams, including safeguarding are made aware.

All colleagues have access to the BHT Safeguarding team for support and guidance when they are concerned about modern day slavery or trafficking.

BHT has a small team of Freedom to Speak Up Guardians who provide daily outreach to colleagues across the Trust offering support to an individual or to teams who wish to raise a concern. The role of the Freedom to Speak Up Guardian is covered at the Trust's monthly corporate induction, the Trust has a 'Speaking Up, Raising Concerns' Policy in place and the importance of speaking up is celebrated annually via October Speaking Up Month.

Trust activities and policies are required to have an Equality Impact Assessment (EQIA) completed.

## **Assessing and managing risk and due diligence processes in relation to slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

The Trust reviews its Modern Slavery and Human Trafficking Statement on an annual basis and presents it at a Board meeting in Public. This demonstrates a public commitment, ensures visibility and encourages reporting standards.

To identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain:

- The Trust adheres to the National NHS Employment Checks/Standards (this includes employees UK address, right to work in the UK and suitable references).
- The Trust has systems to encourage the raising and reporting of concerns and the protection of whistle-blowers.
- The Trust purchases a significant number of products through NHS Supply Chain, whose Supplier Code of Conduct includes a clause stating that 'the supplier shall

make no use of forced or compulsory labour'. Where possible, all other contracts are governed by standard NHS Terms & Conditions which include significant requirements related to modern slavery as well as environmental, social and labour laws.

- The majority of our purchases use existing supply contracts or framework agreements which have been negotiated under the NHS Standard Terms and Conditions of Contract. The framework agreements are governed by NHS Standard Terms & Conditions.
- All suppliers are required by law to comply with the provisions of the UK Modern Slavery Act (2015). This will be reinforced where appropriate by Standard Selection Questionnaires as part of tender processes along with use of NHS Standard Terms and Conditions either direct with suppliers or through framework agreements. The 2022 updates to these contracts strengthen the position on Modern Slavery, including the option to terminate for breaches.

## **Effective action taken to address modern slavery – Performance**

### **Indicators**

The Trust is committed to social and environmental responsibility and has zero tolerance for Modern Slavery and Human Trafficking. Any identified concerns regarding Modern Slavery and Human Trafficking are escalated as part of the organisational safeguarding process. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BHTs slavery and human trafficking statement for the current financial year.

All employees have a personal responsibility for the successful prevention of slavery and human trafficking with the procurement department taking responsibility for overall compliance.

A Freedom to Speak Up Report is submitted quarterly to the Trust Strategic People Committee and twice a year to the Trust Board. Any themes or trends are highlighted through these reporting mechanisms but should something be of concern such as trafficking or modern slavery these would be raised immediately either by exception reporting or direct to an executive director as appropriate.

### **Training on modern slavery and trafficking**

Safeguarding training is mandatory for all colleagues and includes information on trafficking and modern-day slavery in order to promote the knowledge and understanding of escalating concerns via the Home Office national referral mechanism/duty to notify process.

### **Conclusion**

This statement has been approved by the Board, who will review and update it on an annual basis.