

Modern Slavery Act 2015 Section 54 - Slavery and Human Trafficking Statement

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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.

We are recognised nationally for our urology and skin cancer services and are a regional specialist centre for burns care, plastic surgery, stroke and cardiac services and dermatology. In addition, we provide specialist spinal services at our world renowned National Spinal Injuries Centre for patients from across England and internationally.

We are part of the Buckinghamshire Integrated Care Partnership which comprises of Buckinghamshire Healthcare NHS Trust and Buckinghamshire Council. The Buckinghamshire Integrated Care Partnership (ICP) is part of the wider Buckinghamshire, Oxfordshire and Berkshire West Integrated Care System (ICS).

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 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 also has a team of Freedom to Speak Up Guardians who will provide support to an individual raising a concern; the role of the Freedom to Speak Up Guardian is covered at the Trust's monthly corporate induction.

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 provision around forced labour. Other contracts are governed by standard NHS Terms & Conditions. High value contracts are effectively managed, and relationships built with suppliers.
- The majority of our purchases utilise existing supply contracts or frameworks which have been negotiated under the NHS Standard Terms and Conditions of Contract, these all have the requirement for suppliers to have suitable anti-slavery and human trafficking policies and processes in place. Where a suitable framework exists, we use them in preference to tendering. These are run by NHS procurement entities and 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 NHS standard contracts govern how we engage with our suppliers and require compliance with relevant legislation, including the Modern Slavery Act 2015. The 2022 updates to these contracts strengthen our position on Modern Slavery, extending requirements and the option to terminate for breaches of social and labour laws.

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 BHT's 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 Workforce 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

The Board is asked to note this statement to be published on the Trust's website.