

**Executive Summary**  
**Report to the Board of Directors**  
**Held on 27 April 2021**

<b>Subject</b>	Modern Slavery Act Statement
<b>Supporting TEG Member</b>	Sandi Carman, Assistant Chief Executive
<b>Author</b>	Judith Green, Corporate Governance Manager
<b>Status</b>	For discussion

**PURPOSE OF THE REPORT**

To outline the requirement to produce and publish a Modern Slavery Act Statement and to present for approval an updated statement for publication supported by sources of evidence / assurance used to identify the priorities for action referenced in the statement.

**KEY POINTS**

Background

- Section 54 of the Modern Slavery Act 2015 requires every organisation which supplies goods or services, and carries on a business in the UK with an annual turnover of £36m or more to set out in a published statement the steps it 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.
- Modern Slavery is an umbrella term used to describe the offences covered by this legislation, these being slavery, servitude and forced or compulsory labour and human trafficking.
- In order to meet and demonstrate compliance with the minimum legal requirements an organisation must:
  - Update its modern slavery statement annually (within six months of the financial year end)
  - Publish a Board approved statement signed by an appropriate director on its website, with a link to this available in a prominent place on its homepage.

Development of a statement

- The approach to updating the Trust’s Modern Slavery Act Statement and to evidencing assurance underpinning the statement has been reviewed to ensure compliance with the above requirements can be sustained.
- The revised approach adopted will also ensure that opportunities for consistent and continued improvement are reflected and monitored through the development of an updated action plan.
- A benchmarking exercise has been undertaken to review modern slavery act statements of other NHS foundation trusts and of local authorities to inform drafting of the revised statement which is appended to this paper as Appendix A.
- The Modern Slavery Act itself does not dictate in precise detail what a statement must include or how it should be structured, however best practice guidance does confirm the scope of information that may be included and this has been reflected in the statement.

- With input from key internal stakeholders work has been undertaken to evidence separate components of the statement. This assurance is set out as Appendix B which has been discussed by TEG and updated with further input from TEG members.

#### Continuous improvement

- The log presented as Appendix B identifies gaps in assurance with actions identified to support a consistent and continuous improvement approach to identifying and tackling modern slavery. These actions have been referenced as next step priorities within the statement. The Assurance and Evidence Log is an internal reference document and does not form part of the published statement.
- It has been agreed that TEG will monitor progress against this action plan on a six monthly basis.

### IMPLICATIONS<sup>2</sup>

AIMS OF MAKING A DIFFERENCE : Corporate Strategy		Tick as appropriate
1	Deliver the Best Clinical Outcomes	
2	Provide Patient Centred Services	
3	Employ Caring and Cared for Staff	✓
4	Spend Public Money Wisely	✓
5	Deliver Excellent Research, Education & Innovation	

### RECOMMENDATIONS

The Board of Director is asked to:

- **APPROVE** the Modern Slavery Act Statement for signature by the Trust Chair and publication on the Trust website.
- **NOTE** the appended continuous improvement plan approved by TEG and the arrangements in place for monitoring delivery of actions to support a consistent and continued improvement approach to tackling modern slavery.

### APPROVAL PROCESS

Meeting	Date	Approved
TEG	17 March 2021	Y
TEG – to note agreed updates	21 April 2021	Y
Board of Directors	27 April 2021	

## Modern Slavery and Human Trafficking Statement 2020/21

### Introduction

Sheffield Teaching Hospitals NHS Foundation Trust is committed to preventing acts of modern slavery or human trafficking from occurring in any part of its business operations and supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes Sheffield Teaching Hospital NHS Foundation Trust’s modern slavery and human trafficking statement for the financial year commencing 1 April 2020 and ending 31 March 2021.

It aims to demonstrate that the Trust follows best practice and that all reasonable steps are taken to prevent slavery and human trafficking and also describes planned actions in 2021/22.

This statement has been approved by the Trust’s Board of Directors, which together with the Audit Committee, will review and update it as necessary on an annual basis.

### Structure and business of the organisation

Sheffield Teaching Hospitals NHS Foundation Trust is a first wave NHS Foundation Trust created in July 2004. Its principal purpose is the provision of goods and services for the purposes of the health service in England. The Trust is one of the UK’s busiest and most successful NHS foundation trusts providing personalised, acute, elective, community and specialist healthcare services of a high standard for over two million patients each year

The principal areas of business of the Trust are:

- a) Northern General Hospital
- b) Royal Hallamshire Hospital
- c) Charles Clifford Dental Hospital
- d) Weston Park Hospital Cancer Centre
- e) Jessop Wing, Tree Root Walk
- f) Community Services

With over 18,000 employees, the Trust is one of the biggest employers locally. Through partnerships with the University of Sheffield, Sheffield Hallam University, other health and social care providers and industry, the Trust remains at the forefront of advancements in clinical services, teaching and research. The Trust is part of a major teaching centre with Schools of Medicine, Dentistry and Nursing based across its campuses.

The Trust had an annual revenue budget of over £1billion. The annual accounts are available online at <https://www.sth.nhs.uk/about-us/official-publications/annual-report-and-accounts>.

The organisation's business is managed through clinical and corporate directorates with each of the clinical directorates grouped into one of ten Care Groups. Each Directorate is supported by other professional disciplines including Finance, Human Resources and Informatics. Routine performance, governance and professional issues are managed by the directorates with the Trust Executive Group holding directorates accountable for their performance.

## Policies and procedures relating to modern slavery

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking.

The Trust has policies and procedures in place designed to provide guidance and advice to staff in assessing and managing risks in relation to modern slavery and human trafficking. These policies additionally give a platform for staff to raise concerns about poor working practices. Key policies and procedures include:

- **Safeguarding policies**

The Trust's commitment to contribute to the eradication of modern slavery is reflected in the Safeguarding Adults and Safeguarding Children policies, which have been developed in accordance with safeguarding legislation (including the Care Act 2014 and The Children Act 1989) and national guidance. All staff can contact the Safeguarding Team for support and advice if they have a concern and the Trust's safeguarding intranet pages include information, guidance and the Modern Slavery Helpline.

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

- Provides mandatory safeguarding training for all staff and includes information on modern-day slavery and human trafficking in order to promote the knowledge and understanding of escalating concerns internally and externally via the Home Office national referral mechanism.
- Has a Trust Safeguarding Leads Group reporting into a Committee of the Board of Directors to provide necessary oversight of Safeguarding referrals and a mechanism for identification of trends and learning.
- Demonstrates examples of good practice in respect of awareness raising activity focused on Modern Slavery and Human Trafficking.

- Raising concerns at work policies

The Trust promotes a culture of openness and accountability by encouraging reporting of concerns, including any circumstances that may give rise to risk of slavery or human trafficking. The Trust's Raising Concerns at Work Policy offers guidance to staff on raising concerns confidentially and provides reassurance as to how the Trust will respond to them. Freedom to Speak up Guardians and Advocates are available to provide immediate support and sign-posting for staff members raising concerns. All concerns raised are considered by the Freedom to Speak Up Steering Group to identify shared learning.

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

- Has systems to encourage the reporting of concerns and the protection of 'whistleblowers'.
- Provides all new staff with information on the Raising Concerns at Work Policy and Procedure through corporate induction and the Trust Intranet provides further guidance and contact details for the Trust's Freedom to Speak Up Guardians and Directorate Advocates.
- Makes advice and training about modern slavery and human trafficking available to staff through our Safeguarding training, our Safeguarding policies and procedures and our Safeguarding leads.
- In addition, staff have duties imposed upon them to raise such concerns by their respective professional regulatory bodies, such as the GMC, NMC, ACCA etc.

- Recruitment and selection practices and policies

Overseen by the Trust's Human Resources Department, the Trust has recruitment processes in place to ensure that staff are appointed subject to references, pre-employment checks (including immigration checks and identity checks). This ensures that we can be confident, before staff commence duties, that they have a legal right to work within the Trust. A set of Employment Standards appended to the Trust's Recruitment and Selection Policy outlines requirements to ensure safe and effective recruitment.

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).
- follows NHS Agenda for Change terms and conditions to ensure that staff receive fair pay rates and contractual terms.
- Agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff.
- International recruitment is managed through NHS Professionals who manage the pre-employment check process.

- Equality, diversity and inclusion and human rights policies

The Trust has a range of controls in place to protect staff from discrimination, poor and unfair treatment and/or exploitation. These comply with all respective laws and regulations, including the Equality Act 2010 and Human Rights Act 1998. The Trust is committed to ensuring equality of access to employment and training opportunities for staff and access to personalised care that meets individual needs for our patients. We will eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations in all that we do. All Trust activities and policies are required to have an Equality Impact Analysis (EIA) completed.

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

- has a range of controls in place to protect staff from poor treatment and / or exploitation, which comply with all respective laws and regulations.
- undertakes consultation and negotiation with Trade Unions on proposed changes to employment, work organisation and contractual relations.
- promotes and provides support for the right for staff to raise concerns, for example about poor working practices.

- Procurement strategies

The Trust acknowledges that ethical standards are a core principle for procurement. Through its purchasing policies and by upholding professional practice the Trust sources goods and services in a manner that aims to ensure the wellbeing and protection of workforces across our supply chain. By a combination of purchasing through NHS Supply Chain and using NHS standard terms and conditions that include the requirement for suppliers to have modern slavery and human trafficking policies and processes in place, the Trust minimises the risk of social exploitation; ensuring that people are treated with respect and their rights are protected.

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

- ensures the majority of our purchases utilise existing supply contracts or frameworks which have been negotiated by NHS Supply Chain or under the NHS standard terms and conditions of contract, which all have the requirement for suppliers to have modern slavery and human trafficking policies and processes in place.
- upholds professional practices relating to procurement and supply, and ensures procurement staff attend regular training on changes to procurement legislation.
- requests all suppliers to comply with the provisions of the Modern Slavery Act (2015), through agreement of purchase orders and tender specifications.

## Further steps

The Trust is committed to delivering the following priorities during 2021/22:

- Reviewing Trust policies identified as needing to reference Modern Slavery Act legislation to ensure that policies signpost staff to relevant guidance as appropriate.
- Increasing awareness across the Trust of modern slavery and human trafficking through use of a range of communication methods.
- Ensuring that training delivered by the Trust for Freedom to Speak Up Advocates includes content on modern slavery and human trafficking.
- Updating contract of employment documentation to include reference to Modern Slavery Act legislation.
- Seeking assurance against updated Department of Health and Social Care Code of Practice for international recruitment.
- Developing a Supplier Code of Conduct for the Trust.

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

Approved by the Board of Directors on 27 April 2021

Signed on behalf of Sheffield Teaching Hospitals NHS Foundation Trust

**Annette Laban**  
**Trust Chair**

Assurance / Evidence	Gaps	Action to address gaps in process or assurance
<p><b>Safeguarding policies</b></p> <p>The Trust’s commitment to contribute to the eradication of modern slavery is reflected in the Safeguarding Adults and Safeguarding Children policies, which have been developed in accordance with safeguarding legislation (including the Care Act 2014 and The Children Act 1989) and national guidance. All staff can contact the Safeguarding Team for support and advice if they have a concern and the Trust’s safeguarding intranet pages include information, guidance and the Modern Slavery Helpline.</p>		
<ul style="list-style-type: none"> <li>• <b>Provides mandatory safeguarding training for all staff and includes information on modern-day slavery and human trafficking in order to promote the knowledge and understanding of escalating concerns internally and externally via the Home Office national referral mechanism.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Modern Slavery and Human Trafficking awareness has been embedded into mandatory Safeguarding Training and compliance is monitored at a Trust and Directorate level. Compliance is also reported quarterly to the CCG. Current compliance for Adults and Children is above Trust target.</li> <li>- Section (13) of both the Trust’s <a href="#">Safeguarding Adults Policy</a> and <a href="#">Safeguarding Children Policy</a> provides explicit reference and guidance to staff in relation to the Modern Slavery Act and policy is in date.</li> <li>- <a href="#">Trust Intranet pages</a> for Safeguarding patients clearly signpost staff to members of the Safeguarding Team with names and contact details, including out of hours arrangements.</li> <li>- Above Intranet pages contain a Modern Slavery Link with information resources for staff of matters relating to <a href="#">Modern Slavery</a> including a link to a <a href="#">Modern Slavery Awareness Video</a> and a range of leaflets.</li> <li>- The Home Office national referral line number is detailed within <a href="#">national leaflets</a> linked from this page and is included in the above referenced Trust policies.</li> <li>- Trust representation on the multiagency .Safeguarding Partnership provides a forum to share learning and also access any updates in Modern Slavery and Human Trafficking guidance / legislation to feed into staff training / information resources.</li> </ul>		



<ul style="list-style-type: none"> <li>• <b>Has a Trust Safeguarding Leads Group reporting into a Committee of the Board of Directors to provide necessary oversight of Safeguarding referrals and a mechanism for identification of trends and learning.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Safeguarding Leads Group terms or reference.</li> <li>- Safeguarding Annual Report submitted from the Safeguarding Leads Group to the Healthcare Governance Committee detailing referrals by high level category.</li> </ul>		
<ul style="list-style-type: none"> <li>• <b>Demonstrates examples of good practice in respect of awareness raising activity focused on Modern Slavery and Human Trafficking</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Co-ordinated by the Directorate Safeguarding Champion, a Modern Slavery Awareness Fortnight was held during March 2021 within Acute and Emergency Medicine. This entailed a daily learning point being discussed at nursing handovers and accompanying materials with top tips for recognising modern slavery and human trafficking risks shared electronically via e-mail and departmental social media channels.</li> </ul>	<p><u>Scope to co-ordinate awareness raising campaigns focused on Modern Slavery and Human Trafficking</u></p> <p>While examples of good practice can be identified at Directorate level there is scope to consider a Trust-wide awareness campaign which signpost staff with concerns to the Safeguarding Team.</p>	<p><b>Action</b> – Schedule a Trust-wide communication campaign Modern Slavery and Human Trafficking.</p> <p><b>Lead</b> – Christina Blaydon, Head of Safeguarding</p> <p><b>Deadline</b> – November 2021</p> <p><b>Executive Sponsor</b> – Julie Phelan, Communications Director</p>

Assurance / Evidence	Gaps	Action to address gaps in process or assurance
<p><b>Raising concerns at work policies</b></p> <p>The Trust promotes a culture of openness and accountability by encouraging reporting of concerns, including any circumstances that may give rise to risk of slavery or human trafficking. The Trust’s Raising Concerns at Work Policy offers guidance to staff on raising concerns confidentially and provides reassurance as to how the Trust will respond to them. Freedom to Speak up Guardians and Advocates are available to provide immediate support and sign-posting for staff members raising concerns. All concerns raised are considered by the Freedom to Speak Up Steering Group to identify shared learning.</p>		
<ul style="list-style-type: none"> <li>• <b>Systems are in place to encourage the reporting and review of concerns and the protection of ‘whistleblowers’.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- The Trust’s <a href="#">Raising Concerns at Work Policy</a> gives a platform for employees to raise concerns for further investigation, and our Freedom To Speak Up Advocates, Guardian and Safeguarding Team actively ensure that they are accessible to staff.</li> <li>- A ‘Freedom to Speak Up Month’ held annually each October provides the opportunity for focused campaign activity to supplement regular Trustwide communications across the year.</li> <li>- Freedom to Speak Steering Group reports quarterly to the HROD Committee and produces an Annual Report. Steering Group includes NED representation.</li> <li>- Quarterly reporting to the National Guardian’s Office and Trust data included in its Freedom to Speak Up Index Report published annually which benchmarks Trust referrals.</li> </ul>	<p><u>Raising Concerns at Work Policy</u></p> <p>Current version does not include reference to Modern Slavery Act legislation or signpost staff to Safeguarding guidance.</p>	<p><b>Action</b> – Address the need to include Modern Slavery Act reference within current review of Raising Concerns at Work Policy.</p> <p><b>Lead</b> - Sally Danford, HR Business Partner (Freedom to Speak Up Lead)</p> <p><b>Deadline</b> – July 2021</p> <p><b>Executive Sponsor</b> – Mark Gwilliam, Director of Human Resources and Staff Development</p>
<ul style="list-style-type: none"> <li>• <b>Provides all new staff with information on the Raising Concerns at Work Policy through corporate induction and the Trust Intranet provides further guidance and contact details for the Trust’s Freedom to Speak Up Guardians and Directorate Advocates.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Link from the home page of the Trust Intranet to <a href="#">Freedom to Speak Up Microsite</a> containing contact details, for Guardians and Directorate Advocates by areas of work, alongside access to an electronic version of the above referenced policy.</li> </ul>		

<ul style="list-style-type: none"> <li>• <b>Makes advice and training about modern slavery and human trafficking available to staff through our Safeguarding training, our Safeguarding policies and procedures and our Safeguarding leads.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Trust Intranet pages contain a <a href="#">Modern Slavery Link</a> with information resources for staff of matters relating to Modern Slavery.</li> <li>- <a href="#">Intranet pages</a> for Safeguarding patients clearly signpost staff to members of the Safeguarding Team with names and contact details, including out of hours arrangements and provides links to Trust policies.</li> <li>- Planning in place to publish on PALMS new national training modules issued by the National Guardian’s Office.</li> </ul>	<p><u>Training for F2SUGuardians and Advocates</u></p> <p>Refresh of Advocate training should consider inclusion of Modern Slavery and Human Trafficking information.</p>	<p><b>Action</b> – Refresh of training delivered by Trust for Advocates to include content on Modern Slavery and Human Trafficking.</p> <p><b>Lead</b> - Sally Danford, HR Business Partner (Freedom to Speak Up Lead)</p> <p><b>Deadline</b> – July 2021</p> <p><b>Executive Sponsor</b> – Mark Gwilliam, Director of Human Resources and Staff Development</p>
<ul style="list-style-type: none"> <li>• <b>In addition staff have duties imposed upon them to raise such concerns by their respective professional regulatory bodies, such as the GMC, NMC, ACCA etc.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Evidence included within Job Descriptions and Person Specifications.</li> <li>- Corporate systems are in place to monitor registration status for professionally registered staff.</li> <li>- Requirement implicit within individual professional codes of conduct.</li> </ul>		

Assurance / Evidence	Gaps	Action to address gaps in process or assurance
<p><b>Recruitment and selection practices and policies</b></p>		
<p>Overseen by the Trust's Human Resources Department, the Trust has recruitment processes in place to ensure that staff are appointed subject to references, pre-employment checks (including immigration checks and identity checks). This ensures that we can be confident, before staff commence duties, that they have a legal right to work within the Trust. A set of Employment Standards appended to the Trust's Recruitment and Selection Policy outlines requirements to ensure safe and effective recruitment.</p>		
<p>• <b>Adheres to the national NHS employment checks/standards (this includes employees UK address, right to work in the UK and suitable references)</b></p>		
<ul style="list-style-type: none"> <li>- <a href="#">Recruitment and Selection policy</a> ratified by TEG in January 2012 covers pre-employment checks.</li> <li>- <a href="#">Employment Standards</a> appended to policy set out Confirmation of the right to work in the UK checks.</li> <li>- Pre-employment Checks Internal Audit Report (Jan 2020) – Significant Assurance.</li> </ul>	<p><u>Recruitment and Selection policy</u> Recruitment and Selection policy has exceeded review date. [currently high priority for review]. No explicit reference within this policy to Modern Slavery and Human Trafficking legislation.</p>	<p>Address the need to include Modern Slavery Act reference within revised Recruitment and Selection Policy <b>Action Owner</b> – Debbie Padwick, Head of HR Services <b>Date</b> – September 2021 <b>Executive Sponsor</b> – Mark Gwilliam, Director of Human Resources and Staff Development</p>
<p>• <b>Follows NHS Agenda for Change terms and conditions to ensure that staff receive fair pay rates and contractual terms.</b></p>		
<ul style="list-style-type: none"> <li>- Exceptions that fall outside AfC all ensure fair rates of pay. These include: <ul style="list-style-type: none"> <li>• Apprenticeships which are paid at lawful employment rates for age profile; and</li> <li>• Employees on Spot Salaries where governance arrangements at Executive / Board level are in place for agreement of salaries.</li> </ul> </li> <li>- All evidenced by contract terms and conditions.</li> </ul>	<p><u>Contracts of Employment</u> There is potential to review contract documentation to included explicit reference to Modern Slavery and Human Trafficking legislation</p>	<p>Include reference to Modern Slavery legislation with next review of contract of employment documentation. <b>Action Owner</b> – Debbie Padwick, Head of HR Services <b>Date</b> – April 2022 <b>Executive Sponsor</b> – Mark Gwilliam, Director of Human Resources and Staff Development</p>

<ul style="list-style-type: none"> <li>• <b>Agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Non-medical staff - with very exceptional cases which are subject to TEG approval, the Trust only uses agencies within two framework contracts.</li> <li>- Pre-employment Checks Internal Audit Report (Jan 2020) – Significant Assurance – notes evidence that the Trust receives copies of independent audit reports on suppliers’ compliance with NHS Employment Check Standards. This covered regular suppliers.</li> <li>- Medical Staff - the Trust has a Master Vendor (MV) arrangement in place which only works within one framework. The Trust receives reports on compliance with NHS Employment Check Standards. . No off-framework bookings are carried out for Medical Staff.</li> </ul>		
<ul style="list-style-type: none"> <li>• <b>International recruitment is managed through NHS Professionals who manage the pre-employment check process.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- NHSP Modern Slavery and Human Trafficking Statement outlines pre-employment checks in respect of this <a href="https://www.nhsprofessionals.nhs.uk/Modern-Slavery-Statement">https://www.nhsprofessionals.nhs.uk/Modern-Slavery-Statement</a></li> </ul>	<p><u>Assurance from NHS Professionals</u></p> <p>What assurance do we seek on NHSP pre-employment checks</p> <p>Additionally, can we provide assurance that the Trust’s arrangements for international recruitment are aligned to recently updated DHSC <a href="#">code of practice</a> for the international recruitment of health and social care personnel.</p>	<p><b>Action</b> – Seek assurance against updated DHSC code of practice from NHS Professionals</p> <p><b>Lead</b> – Karen Jessop, Deputy Chief Nurse</p> <p><b>Deadline</b> – end April 2021</p> <p><b>Executive Sponsor</b> – Chris Morley, Chief Nurse</p>

Assurance / Evidence	Gaps	Action to address gaps in process or assurance
<p><b>Equality, diversity and inclusion and human rights policies</b></p>		
<p>The Trust has a range of controls in place to protect staff from discrimination, poor and unfair treatment and/or exploitation. These comply with all respective laws and regulations, including the Equality Act 2010 and Human Rights Act 1998. The Trust is committed to ensuring equality of access to employment and training opportunities for staff and access to personalised care that meets individual needs for our patients. We will eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations in all that we do. All Trust activities and policies are required to have an Equality Impact Analysis (EIA) completed.</p>		
<p>• <b>Has a range of controls in place to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations.</b></p>		
<ul style="list-style-type: none"> <li>- How we treat our employees is managed consistently across the Trust by the Human Resources Directorate and Organisational Development Directorate. The range of controls in place include provision of fair pay rates, fair terms of conditions of employment and access to training and development opportunities.</li> <li>- By adopting the national pay, terms and conditions of service, we have the assurance that all staff will be treated fairly and will comply with the latest legislation. This includes the assurance that staff received, at least, the national minimum wage from 1 April 2015.</li> <li>- Our policies and practices promote and support diversity and inclusion both as an employer and service provider; we recognise and acknowledge that equality, diversity and inclusion are key corporate social responsibilities and we have both and <a href="#">Equal Opportunities in Employment Policy</a> and Equality, Diversity and Inclusion (EDI) Strategy in place.</li> <li>- All new or changed trust activities, programmes, proposals, services and policies are required to have an equality impact assessment (EIA) completed to determine their impact on patients and staff. Monitoring compliance with this requirement to commence.</li> </ul>	<p><u>Equal Opportunities in Employment Policy</u></p> <p>Current version does not include explicit reference to Modern Slavery Act legislation or signpost staff to Safeguarding guidance.</p>	<p><b>Action</b> – Address the need to include Modern Slavery Act reference within new Equal Opportunities Policy.</p> <p><b>Lead</b> - Sally Edwards, Head of Equality, Diversity and Inclusion / Debbie Padwick, Head of HR Services</p> <p><b>Deadline</b> – July 2021</p> <p><b>Executive Sponsor</b> – Mark Gwilliam, Director of Human Resources and Staff Development</p>

<ul style="list-style-type: none"> <li>- Our Equality Diversity and Inclusion (EDI) Board has oversight, and provides effective governance, of the work we are doing to ensure that we treat all patients and staff fairly, without discrimination and with dignity and respect. The EDI Board reports to TEG through submission of its minutes</li> <li>- We have Staff Network Groups established which support staff to speak up and raise issues and / or concerns; these groups work closely with the EDI Team and report into the EDI Board.</li> </ul>		
<ul style="list-style-type: none"> <li>• <b>Undertakes consultation and negotiation with Trade Unions on proposed changes to employment, work organisation and contractual relations.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Partnership Forum <a href="#">terms of reference</a>.</li> <li>- The Partnership Forum reports into TEG through submission of its minutes.</li> </ul>		
<ul style="list-style-type: none"> <li>• <b>Promotes and provides support for the right for staff to raise concerns, for example about poor working practices.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Cross reference to previous section (Raising concerns at work):             <ul style="list-style-type: none"> <li>▪ Systems to encourage the reporting of concerns and the protection of whistleblowers.</li> <li>▪ The Trust’s Raising Concerns at work Policy</li> <li>▪ In addition staff have duties imposed upon them to raise such concerns by their respective professional regulatory bodies, such as the GMC, NMC, ACCA etc.</li> </ul> </li> <li>- The Trust’s Grievance and Dispute Policy and Procedure supports the promotion of fairness and transparency in decisions taken by management representatives and demonstrate a committed to a working environment where all employees are treated fairly, and any concerns over actions or decisions taken are dealt with without delay, using informal routes to address the concerns wherever possible.</li> </ul>		

Assurance / Evidence	Gaps	Action to address gaps in process or assurance
<p><b>Procurement strategies</b></p> <p>The Trust acknowledges that ethical standards are a core principle for procurement. Through its purchasing policies and by upholding professional practice the Trust sources goods and services in a manner that aims to ensure the wellbeing and protection of workforces across our supply chain. By a combination of purchasing through NHS Supply Chain and using NHS standard terms and conditions that include the requirement for suppliers to have modern slavery and human trafficking policies and processes in place, the Trust minimises the risk of social exploitation; ensuring that people are treated with respect and their rights are protected.</p>		
<ul style="list-style-type: none"> <li>• <b>Ensures the majority of our purchases utilise existing supply contracts or frameworks which have been negotiated by NHS Supply Chain or under the NHS standard terms and conditions of contract, which all have the requirement for suppliers to have modern slavery and human trafficking policies and processes in place.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- Percentage of overall spend on products through NHS Supply Chain is a Model Hospital metric and monthly performance reported as a key internal key performance indicator. Currently at 40% (low valuable consumables) with Procurement Department actively working towards increasing.</li> <li>- Requirement for suppliers to have relevant policies and processes in place is evidenced within terms and conditions of contracts with suppliers [Section 10.1 of Standard NHS Terms and Conditions of Contract]</li> </ul>		
<ul style="list-style-type: none"> <li>• <b>Upholds professional practices relating to procurement and supply, and ensures procurement staff attend regular training on changes to procurement legislation.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- The Trust's Procurement Department commits to supporting and encouraging relevant developmental and legislative updates and training.</li> <li>- Compliance with mandatory Safeguarding training (Level 1) is monitored and Procurement Team performs very well against above Trust target.</li> <li>- Section 6.5 of the Trust's <a href="#">Procurement Policy</a> references ethical standards to be adopted by Trust staff engaged in the procurement process and makes reference to the policy supporting the importance of ethical behaviour in that Trust staff should have an awareness of the seven principles of life, known as the Nolan principles <a href="https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2">https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2</a></li> </ul>		



<ul style="list-style-type: none"> <li>- Additionally, all members of the Procurement Department are expected to abide by the Chartered Institute of Purchasing and Supply’s Professional Code of Ethics.</li> <li>- Members of the Procurement Department have access to annual programme of courses and service updates provided through Regional Skills Development Network.</li> <li>- Through membership of the North of England Collaborative Procurement Consortium the Trust has access to its training course provision and also benefits from arrangements in place for this consortium to vet suppliers, especially staffing suppliers.</li> </ul>		
<ul style="list-style-type: none"> <li>• <b>Requests all suppliers comply with the provisions of the Modern Slavery Act (2015), through agreement of our purchase orders and tender specifications.</b></li> </ul>		
<ul style="list-style-type: none"> <li>- The Trust’s <a href="#">Procurement Policy</a> (section 6.4.3) states that specifications and/or conditions of contract used by the Trust will make clear contractors’ obligations in relation to 4.3) ensuring that suppliers work to eliminate the potential for unlawful or unfair discrimination to occur in relation to their employment practices and through the provision of goods, services and works to the Trust.</li> <li>- Also evidenced (as stated above) within terms and conditions of contracts with suppliers [Section 10.1 of Standard NHS Terms and Conditions of Contract]</li> </ul>	<p><u>Supplier Code of Conduct</u></p> <p>There is scope to consider best practice development of a Supplier Code of Conduct to further strengthen the request for supplier to comply with Modern Slavery Act provisions through agreement to adopt this Code.</p>	<p><b>Action</b> – Develop a STH Supplier Code of Conduct</p> <p><b>Lead</b> - Helen Trippett, Deputy Director of Procurement / Andrea Smith, Procurement Director</p> <p><b>Deadline</b> – September 2021</p> <p><b>Executive Sponsor</b> – Neil Priestley, Director of Finance</p>