

**Executive Summary**  
**Report to the Board of Directors**  
**Held on 24 May 2022**

<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<sup>1</sup></b>	For approval

**PURPOSE OF THE REPORT**

To present an update on the continuous improvement plan underpinning the Trust's Modern Slavery Act Statement to inform publication of an updated statement for 2021/22 in line with requirements under the Modern Slavery Act 2015.

**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 organisations 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.
- In 2021 a revised approach to producing the Trust's Modern Slavery Act Statement and to evidencing underpinning assurance was implemented to ensure that compliance with the above requirements could be sustained. This work was informed by a benchmarking review of modern slavery act statements published by NHS foundation trusts and of local authorities and the statement developed with input from key internal stakeholders.
- Following approval by the Board of Directors, the [statement](#) for the financial year commencing 1 April 2020 and ending 31 March 2021 was published on the Trust Website and delivery of actions within the continuous improvement plan has been undertaken by the CEO Office through a mid-year review of progress and this end of year position statement.

Updated statement for 2021/22

- In updating the statement further consultation has taken place with internal leads. This has sought to refresh evidence for each separate component of the statement and assess delivery of and further develop the continuous improvement plan.

- An updated Modern Slavery Act Statement is presented for approval as Appendix A.
- Appendix B presents an Assurance and Evidence Log identifying progress and ongoing / new actions to support a consistent and continuous improvement approach to tackling modern slavery. 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.

#### Next Steps

- Any additional input from this TEG review will be incorporated into an update of the statement to be presented to the Board of Directors in May 2022 with a recommendation to approve the statement for signature by the Trust Chair and publication on the Trust website.

### IMPLICATIONS

Aims of Making a Difference – The Next Chapter		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	
6	Create a Sustainable Organisation	

### RECOMMENDATIONS

TEG 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 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	4 May 2022	Y
Board of Directors	24 May 2022	

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 links to video resources (<a href="#">Modern Slavery Awareness, National Referral Mechanism</a>) plus a range of relevant leaflets.</li> <li>- The Modern Slavery Helpline number and online reporting link are detailed within <a href="#">national leaflets</a> linked from this page and are 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 Assurance Committee 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 Assurance Committee terms of reference.</li> <li>- <a href="#">Safeguarding Annual Report</a> submitted from the Safeguarding Assurance Committee to the Quality 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> <li>- <b>April 2022 Update</b> - The Trust has a series of <a href="#">7 Minute Briefings</a> on key Safeguarding topics available via the Safeguarding Patients Intranet site, one of which focuses on <a href="#">Modern Slavery and Human Trafficking</a>.</li> <li>- <b>April 2022 Update</b> - <a href="#">Modern Slavery Statutory Guidance</a> (published March 2022) is available on the Modern Slavery and Human Trafficking intranet page.</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>April 2022 Update</b></p> <p>Further examples of good practice have been published on the Trust Intranet.</p> <p>There was limited capacity to co-ordinate a communications campaign to coincide with Modern Slavery Awareness Day in January 2022. The opportunity will be taken to align a campaign with the Sheffield Safeguarding Partnership Safeguarding Awareness week in November 2022.</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>Original Deadline</b> – November 2021</p> <p><b>New Deadline – November 2022</b></p> <p><b>Executive Sponsor</b> – Julie Phelan, Communications Director</p> <p><b>Action Status</b> – Action to be carried forward</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="#">Freedom to Speak Up Policy</a> (formerly Raising Concerns at Work Policy) gives a platform for employees to raise concerns for further investigation, and our Freedom To Speak Up (FTSU) 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 Trust-wide communications across the year. <b>April 2022 Update</b> – an electronic communication campaign was co-ordinated for the FTSU month in October 2021.</li> <li>- Freedom to Speak Steering Group reports quarterly to the HROD Committee (a Committee of the Board of Directors) 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>April 2022 Update</b></p> <p>Policy updated with relevant references. Now titled Freedom to Speak up Policy.</p> <p>Ratified by TEG 29 December 2021.</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> <p><b>Action Status</b> – <b>Action completed December 2021</b></p>
<ul style="list-style-type: none"> <li>• <b>Provides all new staff with information on the Freedom to Speak Up 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>- Progress made in publishing on PALMS new national training modules issued by the National Guardian’s Office. <b>April 2022 Update</b> - first two published with final module for senior managers to be uploaded imminently.</li> </ul>	<p><u>Training for F2SU Guardians and Advocates</u></p> <p>Refresh of Advocate training should consider inclusion of Modern Slavery and Human Trafficking information.</p> <p><b><u>April 2022 Update</u></b></p> <p>This will be incorporated within training scheduled for May 2022.</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>Original Deadline</b> – July 2021</p> <p><b>New Deadline – May 2022</b></p> <p><b>Executive Sponsor</b> – Mark Gwilliam, Director of Human Resources and Staff Development</p> <p><b>Action Status</b> – Action to be carried forward</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><b><u>Update April 2022</u></b> [updated policy scheduled to be discussed with Partnership Forum at its meeting in June 2022]</p>	<p>Address the need to include Modern Slavery Act reference within revised Recruitment and Selection Policy</p> <p><b>Action Owner</b> – Debbie Padwick, Head of HR Services</p> <p><b>Original Deadline</b> – September 2021</p> <p><b>New Deadline</b> – 31 August 2022</p> <p><b>Executive Sponsor</b> – Mark Gwilliam, Director of Human Resources and Staff Development</p> <p><b>Action Status</b> - Action to be carried forward</p>

<ul style="list-style-type: none"> <li>• <b>Follows NHS Agenda for Change terms and conditions to ensure that staff receive fair pay rates and contractual terms.</b></li> </ul>		
<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></p> <p>There is potential to review contract documentation to included explicit reference to Modern Slavery and Human Trafficking legislation.</p> <p><b><u>Update April 2022</u></b></p> <p>[next review of document planned for quarter two 2022/23]</p>	<p>Include reference to Modern Slavery legislation with next review of contract of employment documentation.</p> <p><b>Action Owner</b> – Debbie Padwick, Head of HR Services</p> <p><b>Original Deadline</b> – April 2022</p> <p><b>New Deadline</b> – 31 August 2022</p> <p><b>Executive Sponsor</b> – Mark Gwilliam, Director of Human Resources and Staff Development</p> <p><b>Action Status</b> - Action to be carried forward</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>		

<p>• <b>International recruitment is managed through NHS Professionals who manage the pre-employment check process.</b></p>		
<p>- 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></p>	<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><u>April 2022 Update</u></b></p> <p>Confirmation provided that NHS Professionals are on the NHS <a href="#">Employers Approved Agency list</a> and comply with the revised code of practice (published 25 February 2021) for the International Recruitment of Healthcare Professionals.</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> <p><b>Action status</b> – <b>Action completed June 2021</b></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 Equal Opportunities Policy and an 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>April 2022 Update</b></p> <p>The Trust has drafted a new Equal Opportunities Policy explicitly refers to the Modern Slavery Act Statement and the Safeguarding Children and Vulnerable Adults Policy within the 'Associated Trust and external documents' section and contains an electronic link to both.</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> <p><b>Action Status</b> – <b>Action completed</b></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>- 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>	<p>This policy is currently progressing through the formal policy approval process.</p>	
<p>• <b>Undertakes consultation and negotiation with Trade Unions on proposed changes to employment, work organisation and contractual relations.</b></p>		
<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>		
<p>• <b>Promotes and provides support for the right for staff to raise concerns, for example about poor working practices.</b></p>		
<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>▪ <b>April 2022 Update</b> - The Trust's <a href="#">Freedom to Speak Up Policy</a> (formerly Raising Concerns at Work Policy) was updated and ratified in December 2021)</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 <a href="#">Grievance and Dispute Policy and Procedure</a> 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 <a href="#">Nolan principles</a>.</li> </ul>	<p><b><u>April / May 2022 Update</u></b></p> <p>There is a need to review newly passed legislation with respect to preventing NHS organisations from using goods and services linked to slavery or human trafficking and evidence steps to assess the risks associated with individual suppliers and the basis on which they should be excluded from any tendering process.</p>	<p><b>New Action</b> – Review impact of new legislation / undertake risk assessments as appropriate.</p> <p><b>Lead</b> - Helen Trippett, Deputy Director of Procurement / Andrea Smith, Procurement Director</p> <p><b>Deadline</b> – March 2023</p> <p><b>Executive Sponsor</b> – Neil Priestley, Chief Finance Officer</p> <p><b>Action Status</b> – New Action</p>

<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><u>Update April 2022</u></p> <p>Draft has been developed and is progressing through approval processes.</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, Chief Finance Officer</p> <p><b>Action Status:</b> Carry forward action to focus on implementation of Code of Conduct during 2022/23</p>