

Appendix 1

Modern Slavery Act Action Plan

Action	Notes	Deadline	Lead
Board paper on MSA and compliance implications, including action plan and Draft 2015/16 Statement to be signed by Chairman and CEO for Board meeting on 20 April.	The Act allows for making a statement for 2015/16 that no steps have been taken to ensure business and supply chains are MS free. However, the Trust can report limited progress, namely a project plan for 2016/17 has been developed.	13.04.16	AC
Agree future governance arrangements re ongoing MSA compliance.	It is recommended that TEG has oversight of MSA Action Plan. Consideration should be given to identify a Board member or senior manager to champion the project and gain senior management buy-in.	13.04.16	NR
Subject to Board approval, publish the MSA Board approved 2015/16 Statement on the Trust's website.	The Act requires the link to the Statement to be in a prominent place on the home page itself - either directly visible on the homepage or part of an obvious drop-down menu on the homepage.	May 16	JP
Include a short summary in Annual Report and Accounts including directions to reader how to find the full 2015/16 Board-approved Statement on the Trust's website.	In the absence of any direction in the 2015/16 Annual Reporting Manual, include the summary within the Accountability Section under the Directors Report.	May 16	PT, JP
Scope the Trust procurement flows to identify the key leads with a procurement function.	Although most procurement will be through Supplies, other directorates have a significant procurement role e.g. Estates, Pharmacy, Catering, Human Resources.	Jun 16	AC TW
Establish a project group to lead the MSA work, agree Terms of Reference including membership, accountability and reporting arrangements.	Review and amend this action plan, as appropriate. Identify work streams with agreed deadlines, KPIs and performance management arrangements. Consider the workload implications of the project plan and, as appropriate, make a business case for additional resource.	Jun 16	AC TW
Respond to national initiatives to comply with MSA, as appropriate.	It is anticipated that further compliance guidance, amended standard contracts, relevant regulations etc will be issued by Home Office, DH, NHSE, NHS Improvement, specialist bodies such as NHS Employers, NHS Supplies and professional bodies such as Chartered	Apr 16 onward	AC TW

	<p>Institute of Purchasing and Supply (CIPS) from 31 March 2016 onward. For example, from early 2016, NHS Supply Chain will be contacting all its suppliers which meet the £36m pa turnover threshold requesting disclosure details and will be communicating with Medical Supplier Boards and relevant Trade Associations on the matter.</p>		
--	---	--	--

Action	Notes	Deadline	Lead
Risk assess the Trust's own business and map its supply chains in terms of the risk of slavery and human trafficking taking place and to amend this action plan to manage any identified additional risks.	Any risk assessment should go further than geographical risk analysis i.e. Asia and Africa but should include high risk sectors e.g. cleaning products, laboratory supplies, surgical instruments etc to develop a comprehensive risk profile.		AC TW
Develop and deliver a risk-based programme of due diligence in the Trust's own business and its supply chains.	Taking a risk-based approach, due diligence will include seeking assurances from suppliers re MS, reviewing existing contracts, ensuring relevant MS provisions are included in Pre-qualification questionnaire and in new contracts. It is anticipated that the terms of the national standard contract will be amended to incorporate MS compliance and the Trust will amend its contracts accordingly.	Jun 16 onward	TW
Seek opportunities for joint working with partners to provide city-wide, patch, regional or national networked cover.	The significant majority of the Trust's supply chains will be used by other NHS organisations. It would be more efficient and cost effective for collaborative working to seek and share assurances. Such an approach should simplify managing the remaining minority of NHS supply chains that are unique to the Trust.	Jun Onward	TW
Engage Internal Audit to review the Trust's due diligence process and to test a sample of supply chains.	Any change to Audit Plan requires Audit Committee approval.	Jan/Feb 2017	JW
Review and update relevant Trust policies and procedures currently in place and develop additional policies, as necessary.	Key current policies include Safeguarding Adults and Raising Concerns at Work. In addition to referencing MSA, make provision to respond to an incidence of MS. Potential new policies for development include a Procurement Code of Practice.	Aug 16	AC
Develop a programme of staff training concerning Modern Slavery.	The programme should make provision for in-depth training for staff directly involved in procurement as well as targeted awareness raising training for managers and staff.	Sept 16	tbc

Key:

- AC Corporate Governance Project Manager
- PT Risk and Assurance Manager
- JP Director of Communications and Marketing

TW Procurement Director
JW Deputy Director of Finance – Financial Accounting
NR Assistant Chief Executive