

## Modern Slavery and Human Trafficking Statement 2021/22

### 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 2021 and ending 31 March 2022.

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 2022/23.

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 provides 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 Services
- d) Weston Park Cancer Centre
- e) Jessop Wing
- f) Community Services

With over 18,500 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 seeks to be 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](#).

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 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.
- Demonstrates examples of good practice in respect of awareness raising activity focused on Modern Slavery and Human Trafficking.

- Freedom to speak up policies (formerly Raising concerns 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 Freedom to Speak Up 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 signposting 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 Freedom to Speak Up 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.

## Priorities delivered during 2021/22

The Trust progressed the following actions during 2021/22 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:

- Commencing the review of Trust policies identified as needing to reference Modern Slavery Act legislation to ensure they signpost staff to relevant guidance.
- Increasing awareness across the Trust of modern slavery and human trafficking through use of a range of communication methods.
- Seeking assurance against updated Department of Health and Social Care Code of Practice for international recruitment.
- Drafting a Supplier Code of Conduct for the Trust.

## Further steps

The Trust is committed to a consistent and continuous improvement approach to identifying and tackling modern slavery and has identified the next step priorities for delivery during the next financial year:

- Reviewing further relevant Trust policies identified as needing to reference Modern Slavery Act legislation.
- Aligning a campaign with the Sheffield Safeguarding Partnership Safeguarding Awareness week in November 2022 to increase awareness across the Trust of modern slavery and human trafficking.
- Ensuring that training delivered by the Trust for Freedom to Speak Up Guardians / Advocates includes content on modern slavery and human trafficking.
- Updating contract of employment documentation to include reference to Modern Slavery Act legislation.
- Undertaking risk assessment with respect to anticipated new legislation preventing NHS organisations from using goods and services linked to slavery or human trafficking.
- Implementing the 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 24 May 2022

Signed on behalf of Sheffield Teaching Hospitals NHS Foundation Trust



**Annette Laban, Trust Chair**