

## Modern Slavery and Human Trafficking Act 2015 - Annual Statement 2021/22

### Introduction

This statement is made pursuant to s54 of the Modern Slavery Act 2015 and sets out the steps that Northumbria Healthcare NHS Foundation Trust and its subsidiaries (Northumbria Healthcare Facilities Management Ltd and Northumbria Primary Care Ltd) have taken, and are continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain during the year ending 31 March 2022.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Northumbria Healthcare has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Structure, Business and Supply Chain

#### Our Organisation

Northumbria Healthcare NHS Foundation Trust provides hospital and community health services in North Tyneside and hospital, community health and adult social care services in Northumberland to approximately half a million people. We provide care from three general hospitals – Hexham, Wansbeck and North Tyneside, community hospitals in Alnwick, Berwick, Rothbury and Blyth, an integrated health and social care facility at Haltwhistle, an elderly care unit in Morpeth and outpatients and diagnostic centres at Sir GB Hunter in Wallsend and Morpeth NHS Centre.

In June 2015 we opened The Northumbria Specialist Emergency Care Hospital (The Northumbria) in Cramlington. This is the first purpose-built hospital of its kind in the country, with emergency care consultants working 24 hours a day, seven days a week and specialists in a broad range of conditions on site seven days a week.

Our annual turnover is over £648 million and we have a workforce of around 9,500 staff working across our hospitals and in the community.

#### Supply Chain

Northumbria Healthcare NHS Foundation Trust procures from 10,000 suppliers, who provide a range of supplies and services, including medical, other goods, building and construction, consultation and services from other NHS bodies and non NHS bodies.

The procurement of goods and services is undertaken in one of three ways:

1. Through the NHS National Procurement process
2. Through Procurement Frameworks
3. Northumbria Healthcare NHS Foundation Trust direct procurement

#### Governance

We have established a Modern Slavery Working Group to drive the development and delivery of our modern slavery strategy across our organisation. It includes representation

from core functions key to driving change, including Procurement, HR, Training, Safeguarding, Equality & Diversity, Corporate & Social Responsibility, Finance and representation from our subsidiary companies.

The working group reports to the Executive Director of Finance and is also attended by the Executive Director of Nursing.

#### Working with others

We are working with Slave-Free Alliance, an anti-slavery non-government organisation, using their expert guidance to ensure our approach remains effective.

### **Our policies in relation to slavery and human trafficking**

Northumbria Healthcare NHS Foundation Trust is aware of our responsibilities towards patients, service users, employees and the local community and expects all suppliers to the Trust to adhere to the same ethical principles. We have internal policies and procedures in place that assess supplier risk in relation to the potential for modern slavery or human trafficking.

The trust considers the likely impact of and any associated criteria with regard to social issues within its supply chain prior to the commencement of a procurement process wherever possible through its Sustainable Impact Assessment Tool for procurement activity over £100,000. The trust has also implemented the Standard Selection Questionnaire (SQ), which includes the requirement for supplier disclosure of any offence under the Mandatory Exclusion Grounds and also requires confirmation of compliance with reporting requirements under Section 54 of the Act 2015.

In addition, we operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will.
2. Equal Opportunities. We have a range of controls to protect staff from poor treatment and/or exploitation, which complies with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.
3. Safeguarding policies. We adhere to the principles inherent within both our safeguarding children and adults policies. These provide clear guidance so that our employees are clear on how to raise safeguarding concerns.
4. Whistle blowing policy. We operate a whistle blowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, without fear of reprisals.
5. Standards of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act. It is aligned and compliments the UK Governments Supplier Code of Conduct.

## Due Diligence Processes

### Our workforce

Northumbria Healthcare NHS Foundation Trust's recruitment process includes completion of an application form, structured interviews and rigorous pre-employment checks, which include detailed references and right to work checks. The recruitment process provides significant barriers in preventing the likelihood of modern slavery being present in our organisation.

Other steps which further reduce the likelihood of modern slavery existing in our workforce include;

1. Rigour in the recruitment process has been maintained throughout the Covid-19 pandemic.
2. Safeguarding of potential employees is carried out, for example, all new and existing employees must have and control their own bank account to prevent financial abuse, which is a key element found in modern slavery.
3. We use limited numbers of temporary workers which are sourced on government approved frameworks. They adhere to the Same ID checks as directly employed new starters.

### Our Supply Chain

Northumbria Healthcare NHS Foundation Trust has an extensive and varied supply chain of over 10000 tier 1 suppliers. Procurement is managed through a shared procurement service with Northumberland County Council. The service comprises of 3 distinct teams:

- Leadership team – Provides collaborative strategic leadership
- Central Contracting Team – Procurement activity above £50K
- NHS Operations Team – Procurement activity below £50K

The procurement of goods and services is undertaken in one of three ways:

1. Through the NHS National Procurement process
2. Through Procurement Frameworks
3. NHCT procures directly

Where procurement of good and services are obtained through the NHS national process, or a procurement framework, there is an understanding that due diligence in respect of modern slavery has been undertaken in the supplier selection process. The primary role of Northumbria Healthcare NHS Foundation Trust procurement when procuring through these processes is to assess quality and cost.

Where Northumbria Healthcare NHS Foundation Trust procure directly from suppliers, we recognise we need to understand the features of the suppliers who are at high risk to the threat of modern slavery. During 2021/22 we will be undertaking high-level mapping of our directly procured supply chain with a value of over £100k, to identify high risk suppliers. This will enable us to apply an enhanced layer of scrutiny on those suppliers who potential present the greatest risks.

## Mitigating risk in our business and supply chain

Northumbria Healthcare NHS Foundation Trust has a well-established 'Safeguarding Adults at Risk Policy' that clearly defines procedures for recognising abuse, including modern slavery. The policy includes;

- Duties and responsibilities
- Processes and local arrangements for responding to referrals
- Training and support to staff
- Monitoring and audit.

Northumbria Healthcare NHS Foundation Trust Safeguarding team, which includes a professional safeguarding lead, offers the capability to support safeguarding, risk assessments and ensures a victim-centred approach is provided

## Effectiveness in ensuring modern slavery is not taking place

### Supplier Contract Management

Supplier Contract management sits with our commissioner or business unit/directorate once procurement is complete. Shared Procurement Services provides a corporate contract management framework to support the role of contract management. The framework includes a risk assessment tool to identify the level of risk associated with each contract, to ensure that all contract management activities are proportionate to risk, value and complexity.

We will review our Contract Management Risk Assessment tool to assess that appropriate modern slavery assurance provision is included. This will ensure that ongoing modern slavery due diligence is provided throughout the supplier contact cycle.

## Training

Advice and training about modern slavery and human trafficking is available to staff through our mandatory safeguarding children and adults training programmes, our safeguarding policies and procedures, and our safeguarding leads. All staff have been made aware via the staff update bulletin of the NHS England YouTube video available at: <https://www.youtube.com/watch?v=cRskjppgSNs>

Members of the Procurement senior team are Chartered Institute of Purchasing and Supply (CIPS) qualified and abide by the CIPs code of professional conduct and have undertaken specific training related to modern slavery and human trafficking. The Shared Procurement Service has its own Corporate Social Responsibility Procurement policy and supplier charter.

We are looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business. To assist with this the Trust has undertaken a self- assessment and is working with Slave-Free Alliance.

### **Our performance indicators**

During 2021/22 our Modern Slavery Working Group will agree performance measures against activity to address the threat of modern slavery in our organisation and supply chains.

### **Approval for this statement**

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



**SIR JAMES MACKEY**  
Chief Executive

**27<sup>th</sup> May 2021**