

Modern Slavery and Human Trafficking Statement 2023-24 (DRAFT)

Bradford Teaching Hospitals NHS Foundation Trust (BTHFT) fully supports the Government's objectives to eradicate modern slavery and human trafficking, and recognises the significant role the NHS has to play in both combatting it and supporting victims. This includes being strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

We aim to follow good practice and take all reasonable steps to prevent slavery and human trafficking. We are committed to ensuring that all of our employees are aware of the Modern Slavery Act 2015 and their safeguarding duty to protect and prevent any further harm and abuse when it is identified or suspected that the individual may be or is at risk of modern slavery/human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.

Our structure, our business and supply chains

On 1 April 2004, BTHFT was authorised to become an NHS Foundation Trust by Monitor, the then Independent Regulator of NHS Foundation Trusts, under Section 6 of the Health and Social Care (Community Health and Standards) Act 2003.

BTHFT is an integrated Trust that provides acute, community, inpatient and children's health services. The acute services are provided from the Bradford Royal Infirmary site.

In addition to Bradford Royal Infirmary and St Luke's Hospital, we provide a range of services from community sites at Westbourne Green, Westwood Park, Shipley, Eccleshill, Skipton and the Bradford Macula Centre. We serve a population of around 550,000 people from Bradford and the surrounding area. We have approximately 630 acute beds, employ over 6,750 members of staff, and have more than 500 volunteers supporting our services, and we have been delighted to continue welcoming back our valued volunteers this year following a pause during the pandemic. In 2022/23 we delivered 5,068 babies, performed 16,872 operations in theatre and handled 446,204 outpatient appointments. We had 141,064 attendances at our Emergency Department.

Our policies in relation to slavery and human trafficking

We have internal policies and procedures in place that assess supplier risk in relation to the potential for modern slavery or human trafficking. These include:

- **Safeguarding Adults Policy and Procedure** - includes information on modern day slavery/human trafficking and the actions that staff are expected to take if they suspect that a patient may be a victim of human trafficking.
- **Incident Reporting and Investigation Policy** – advises staff to report incidents of all types, includes concerns regarding modern slavery and human trafficking. By using the local incident management system, appropriate teams, including safeguarding and Freedom to Speak Up are made aware.

- **Freedom to Speak Up: Raising Concerns (Whistleblowing)** - which details how staff can raise any concerns that they may have confidentially.
- **Procurement Policies** – see below.
- **Human resources policies** - provide processes and procedures to ensure that our employees and those employed in our supply chains are treated fairly at all times.

All staff have access to our safeguarding team for support and guidance when they are concerned about modern day slavery or trafficking.

An Equality Impact Assessment (EQIA) is completed for all relevant Trust activities and policies.

Our due diligence processes in relation to slavery and human trafficking in our business and supply chains

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our procurement tenders include a question regarding the Modern Slavery Act. Any suppliers who declare that they do not comply with the legislation will be excluded or disqualified from the procurement process. Additionally, when procuring goods and services, we apply NHS Terms and Conditions which requires suppliers to comply with legislation.

Section 10 (Warranties) of those standard terms and conditions states the following:

10 Warranties

10.1 The Supplier warrants and undertakes that:

10.1.21 *it shall: (i) comply with all relevant Law and Guidance and shall use Good Industry Practice to ensure that there is no slavery or human trafficking in its supply chains; and (ii) notify the Authority immediately if it becomes aware of any actual or suspected incidents of slavery or human trafficking in its supply chains;*
10.1.22 *it shall at all times conduct its business in a manner that is consistent with any anti-slavery Policy of the Authority and shall provide to the Authority any reports or other information that the Authority may request as evidence of the Supplier's compliance with this Clause 10.1.22 and/or as may be requested or otherwise required by the Authority in accordance with its anti-slavery Policy;*

Human Resources processes in place to ensure staff are treated fairly at all times include:

- Confirming the identities of all new employees and their right to work legally in the UK.
- To have assurance from approved agencies that pre-employment clearance has been obtained for agency staff and to safeguard against human trafficking.
- All staff appointed are subject to references, immigration and identity checks, this is to ensure staff have the legal right to work in the UK.

- The Trust has a set of values and behaviours that staff are expected to comply with, and all candidates are expected to demonstrate these attributes as part of the recruitment selection process.
- By adopting the national pay, terms and conditions of service, the Trust has the assurance that all staff will be treated, fairly and that pay, terms and conditions will comply with the latest legislation.
- The Trust has various employment policies and procedures in place designed to provide guidance and advice to staff and managers and also to comply with the relevant legislation. These are accessible on the intranet.
- The Trust is committed to creating and ensuring a non-discriminatory and respectful working environment for all staff.
- The Trust's Equality, Diversity and Inclusion, Grievance, Harassment & Bullying Policies and Freedom to Speak Up policies and procedures additionally give a platform for all employees the freedom to speak up and to raise concerns about anything that gets in the way of staff doing their job.
- Ensuring appropriate mechanisms to regularly review and monitor progress on promoting and supporting equality, diversity and inclusion within the Trust.
- All staff are required to undertake mandatory training in relation to equality, diversity and inclusion and safeguarding.

The parts of our business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk

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).
- The Trust has systems to encourage the reporting of concerns and the protection of staff who do raise a concern.
- The Trust purchases a significant number of products through NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour. Other contracts are governed by standard NHS Terms & Conditions. High value contracts are effectively managed and relationships built with suppliers.
- The majority of our purchases use existing supply contracts or frameworks which have been negotiated under the NHS Standard Terms and Conditions of Contract, these all have the requirement for suppliers to have suitable anti-slavery and human trafficking policies and processes in place. Where a suitable framework exists we use them in preference to tendering. These are run by NHS procurement hubs and contain the standard Terms & Conditions.
- The Trust will request all suppliers to comply with the provisions of the UK Modern Slavery Act 2015, through agreement of our 'Supplier Code of Conduct', purchase orders and tender specifications. All of which will set out our commitment to confirming there is no modern slavery or human trafficking related to BTHFT service delivery and business.

- The Trust upholds professional codes of conduct and practice relating to procurement and supply, including through our Procurement Team's membership of the Chartered Institute of Procurement and Supply (CIPS). Our operational staff are all CIPS members and the majority of them have passed CIPS level 4 which is a part of their PDP objectives.

Our effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains

The Trust is committed to social and environmental responsibility and has zero tolerance for modern slavery and human trafficking. Any identified concerns regarding modern slavery and human trafficking are escalated as part of the organisational safeguarding process.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the procurement department taking responsibility for overall compliance.

A Freedom to Speak Up report is submitted to the People Academy on a quarterly basis (and to the Quality & Patient Safety Academy and Board of Directors for information), which includes an overview of the number of concerns raised by staff and the category that they fall into.

The training about slavery and human trafficking available to our staff

Safeguarding training is mandatory for all staff and includes information on trafficking and modern day slavery in order to promote the knowledge and understanding of escalating concerns via the Home Office national referral mechanism/duty to notify process.

This is our first Modern Slavery and Human Trafficking Statement. We will review it on an annual basis and present it at an open Board of Directors meeting for approval. This demonstrates a public commitment, ensures visibility and encourages reporting standards.

Approved by the Board of Directors on: XX

Next review: September 2024

Signed:

Professor Mel Pickup, Chief Executive