

## Modern Slavery Act 2015 - Annual Statement 2017/18

In accordance with the [Modern Slavery Act 2015](#), East Lancashire Hospitals NHS Trust (ELHT) agreed the following statement regarding the steps it has taken in the financial year 2017/18 to ensure that Modern Slavery i.e. slavery and human trafficking, is not taking place in any part of its own business or any of its supply chains.

### Organisations Structure and Business

ELHT is an integrated provider of hospital and community healthcare services, with some 1079 beds and over 7,500 staff providing a comprehensive range of local services to the 530,000 population of Eastern Lancashire, as well as specialist services to Lancashire and South Cumbria, meeting the often complex needs of a wide range of patients. We have an annual turnover of over £470 million.

ELHT provides over 1 million hospital and community contacts for patients across:

- Emergency and elective inpatient services
- Day case services
- Outpatient services
- Diagnostic and therapeutic services
- Adult and children community services

The majority of acute services are delivered at the main hospital sites in Blackburn and Burnley. ELHT also provides:

- Adult community healthcare services across East Lancashire
- A range of hospitals and community services at Accrington, Clitheroe and Pendle Community Hospitals

ELHT is committed to:

- Comply with the Modern Slavery Act 2015 and regulatory requirements
- Make suppliers and service providers aware that we promote the requirements of the legislation
- Develop an awareness of human trafficking and modern slavery within our workforce
- Consider human trafficking and modern slavery issues when making procurement decisions

## ELHT's Policies on Modern Slavery

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and, in so far as is possible, to requiring our suppliers hold a corresponding ethos.

To identify and mitigate the risks of modern slavery and human trafficking in our own business, ELHT has established robust recruitment procedures, details of which are found in its Pre and Post Employment Checks Policy (HR01 V3). The policy supports compliance with national NHS Employment Checks and CQC standards. The Trust has a number of controls in place to ensure compliance with employment legislation including adherence to NHS Employment Check standards which includes right to work and suitable references.

In addition, all other external agencies providing staff have been approved through Government Procurement Suppliers (GPS). The Trust will audit and monitor agencies (via GPS) who provide staffing for the Trust, (once a year) to ensure that they can provide evidence of identification, qualification and registration.

ELHT's Safeguarding Children and Safeguarding Adults policies incorporate sections on modern slavery. In addition, modern slavery is referenced within the Safeguarding Children and Adult mandatory training from Levels 1-3, which applies to all staff employed by the Trust. The Trust has a Safeguarding Training Strategy which reflects the national Strategy.

ELHT's staff must:

- Undertake Safeguarding training appropriate to their roles and responsibilities.
- Work with the Procurement Department when looking to work with new suppliers so appropriate checks relating to modern slavery can be undertaken.

## Working with Suppliers

The Trust's Procurement Department ensures its supplier base and associated supply chain, which provides goods and/or services to ELHT have taken the necessary steps to ensure modern slavery is not taking place. The Procurement Department have committed to ensuring that this is monitored and reviewed with its supplier base via the Trust's Procurement Strategy.

The staff in the Procurement Department uphold the Chartered Institute of Procurement and Supply (CIPS) code of professional conduct and practice relating to procurement and supply

and have been briefed on the Modern Slavery Act. All members of the Procurement Department are required to undertake Safeguarding training at a level appropriate to their roles and responsibilities. Several members of the Procurement team attended an external Modern Slavery training course in June 2017 and re-fresher training for staff within the newly established Lancashire Procurement Cluster has been scheduled into the training plan.

NHS Supply Chain is ELHT's primary supplier of medical equipment and consumables. In early 2016 they wrote to all suppliers who fall within the £36 million threshold for reporting under the Modern Slavery Act. In this communication, suppliers were signposted to the Home Office guidance as well as the Modern Slavery and Human Trafficking assessment available on the Single Supplier Registration Portal for Government (SID4GOV).

The current sets of NHS Terms and Conditions now include under Clause 10 Warranties of Schedule 2 General Terms and Conditions a requirement for the supplier to comply with all the relevant law and guidance, ensuring there is no slavery or human trafficking in its supply chain and to notify the Authority if it becomes aware of any actual or suspected incidents of slavery or human trafficking. Additionally, there is a requirement for the supplier to be consistent with any anti-slavery policy of the Authority.

The Trust follows good practice, ensuring all reasonable steps are taken to prevent slavery and human trafficking and will continue to support the requirements of the Modern Slavery Act 2015 and any future legislation.

Signed on behalf of the Trust Board

Mr Richard Smyth, Non-Executive Director and Chair of the Audit Committee



Mr Jonathan Wood, Director of Finance and Deputy Chief Executive



Date: 24.5.2018