

## Modern Slavery Act 2015 - Annual Statement 2018/19

In accordance with the [Modern Slavery Act 2015](#), East Lancashire Hospitals NHS Trust (ELHT) makes the following statement regarding the steps it has taken in the financial year 2018/19 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 over 1,000 beds and over 7,500 staff providing a comprehensive range of local services to the 530,000 population of East 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 £500 million.

ELHT provides over one 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 hospital 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 uses 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, the Trust has developed and implemented a Human Trafficking Policy (C119 V2) which is aimed at all staff and is intended to help frontline staff and managers to identify individuals who may have been trafficked and provide good practice guidance. This policy applies to all permanent, locum, agency, bank and voluntary staff at the Trust.

In addition, all other external agencies providing staff have been approved through Crown Commercial Services (CCS). The Trust will audit and monitor agencies (via CCS) 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 take steps to work with its supplier base and associated supply chain partners as far as is possible to identify and mitigate the risks of modern slavery and human trafficking and ensure modern slavery is not taking place.



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. Members of the Procurement team attend external Modern Slavery training courses .

NHS Supply Chain is ELHT's primary supplier of medical equipment and consumables. NHS Supply Chain is ELHT's primary supplier of medical equipment and consumables. Their Global Code of Conduct guides NHS Supply Chain's business practices and their website states that: *"We are clearly committed to the elimination of all forms of forced or compulsory labour and to the effective abolition of child labour."*

### **Supplier code of conduct**

NHS Supply Chain Supplier Code of Conduct outlines the main principles for suppliers in the area of labour standards and worker welfare. All suppliers are expected to adhere to these principles which address issues such as child labour, forced labour, wages, working hours as well as health and safety. The Supplier Code of Conduct is a contractual requirement and has been part of all NHS Supply Chain Framework Agreements since 2009. It is based on the principles of the UN Global Compact.

### **Managing labour standards risks (including risks of modern slavery) – due diligence processes**

NHS Supply Chain has taken steps to reinforce the principles of the supplier code of conduct through the introduction of requirements for suppliers to implement and maintain an effective Labour Standards Assurance System (LSAS). Developed in conjunction with the Department of Health the Labour Standards Assurance System covers the range of policies, procedures and practices that an organisation employs to identify labour standards issues, mitigate risk and drive improvements.

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 relevant authorities if it becomes aware of any actual or suspected





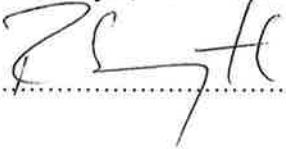
## East Lancashire Hospitals NHS Trust

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

  
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Mr Jonathan Wood, Director of Finance and Deputy Chief Executive

  
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Date:

