

## Modern Slavery Act 2015 – statutory statement

The Modern Slavery Bill was introduced into Parliament on 10th June 2014 and passed into UK law on 26th March 2015. The Modern Slavery Act is an Act to make provision about slavery, servitude and forced or compulsory labour and about human trafficking, including the provision for the protection of victims. A person commits an offence if:

- The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude
- The person requires another person to perform forced or compulsory labour and the circumstance are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour

### Organisational structure

Southport and Ormskirk Hospital NHS Trust comprises Southport and Formby District General Hospital and Ormskirk and District General Hospital in the North West of England. The two hospitals work together to provide high quality, safe health care services across the towns of Southport, Ormskirk and the surrounding areas.

Each hospital has a range of general hospital services, with a full Accident and Emergency department at Southport hospital and children's Accident and Emergency at Ormskirk. Both combined provide a range of planned care, including outpatients, diagnostics, therapies, and day case and inpatient surgery.

The Trust has an overall budget of around £194.9 million each year, over 3491 members of staff and provides access to care for 258,000 patients across the Southport, Formby and West Lancashire area.

The Trust is fully aware of the responsibilities it bears towards patients, employees and the local community and as such, has a strict set of ethical values that we use as guidance with regard to our commercial activities. We therefore expect that all suppliers to the Trust adhere to the same ethical principles.

The Trust has a non-pay budget of £66.7 million of which over £55.8million per annum is spend on goods and services.

### Our Supply Chain

It is important to ensure that suppliers to the Trust have in place robust systems to ensure that their own staff, and organisations within their own supply chain are fully compliant with the requirements of the Modern Slavery Act 2015.

In compliance with the consolidation of offences relating to trafficking and slavery within the Modern Slavery Act 2015, the Trust is currently reviewing its supply chains with a view to confirming that such behaviour is not taking place.

By the end of December 2016, the Trust's Procurement Team will have made contact with each of its top 100 suppliers to request confirmation that they are compliant with the Act. As part of this communication we will issue the Supplier Code of Conduct. This incorporates all suppliers used across the organisation inclusive of pharmaceutical suppliers.

As part of this communication, suppliers will be advised that as part of the Trusts commitment to ensuring that we do not trade with organisations who do not meet the requirements of the Act, they will be required to provide a copy of their annual Modern Slavery Action Statutory Statement detailing actions undertaken to ensure they meet and enforce the requirements of the Act.

This will only apply to suppliers defined as a "commercial organisation" in accordance with the Act:

- Supplies goods and services
- Has a turnover of not less than £36m

The Trust's Procurement team is committed to raising awareness with all suppliers by ensuring that all suppliers the Trust trades with are aware of our commitment to ensure compliance with the Act.

When trading with new suppliers, and prior to establishing the supplier on Trust systems, the supplier will be requested to confirm in writing that they are compliant with the Act.

All potential new suppliers will be issued with the Supplier Code prior to setting them up on our systems.

With immediate effect, the Act will be referred to in all tendering activity undertaken by the Trust's Procurement Team. All tendering for goods and services is managed centrally by the procurement team. A copy of the Act will be sent to all organisations involved in the tendering process along with a short statement from the trust reminding bidders of their obligations under the Act. All suppliers will be requested to issue a statement as part of their tender response regarding their compliance with the Act.

The Modern Slavery Act 2015 and the Supplier Code of Conduct will be published in a prominent place on the Trust's website in accordance with the requirements of the Act.

## **Our Trust**

The Trust employs over 3491 staff and the vast majority of these staff are employed either under pay, terms and conditions of service established nationally under Agenda for Change or Medical and Dental provisions. A small number of staff, which comprise the Trust Board and very senior managers, are employed under local pay, terms and conditions of service which are established by the Remuneration Committee of the Board.

All staff are appointed subject to meeting the NHS Standards on Employment Checks which includes references, health Checks, DBS checks, immigration checks and Identity checks. The Trust expects its existing staff to comply with these standards and all future appointments will be expected to demonstrate these attributes as part of the appointment process. This ensures that the Trust can be confident, before staff commence with the Trust, that we know some background about our staff and that they have a legal right to work for the Trust.

By adopting the national pay, terms and conditions of service, the Trust has the assurance that all staff will be treated fairly and will comply with the various legislative requirements. This includes the assurance that staff received at least, the National Minimum Wage during 2015/16 and from April 2016 the new National Living Wage.

The Trust has various employment policies and procedures in place designed to provide guidance and advice to staff and managers but to also comply with employment legislation. Every policy is impact assessed from an Equality and Diversity perspective and although this does not currently make reference to the Modern Slavery Act 2015, this will be amended during 2016/17 and new policies/procedures and those being reviewed/updated, will be assessed in the future to consider this aspect.

The Trust does have specific policies in place to deal with the Safeguarding of Children and Vulnerable Adults but does not have a specific policy on the Modern Slavery Act and does not feel the need to develop one. However, should the Trust become aware of any issue covered under the Modern Slavery Act, it would immediately report the matter to the Police.

The Trust has an extensive training and development programme which is based on a minimum requirement to complete all statutory and mandatory training and other ad-hoc training which staff are required to undertake for their various roles. Training needs are identified through Individual Performance Development Reviews and a Personal Development Plan produced. Not all staff will require the same awareness and training but in relation to the Modern Slavery Act, the Procurement Team will receive this as a priority.

The Trust employs professionally qualified human resources managers who as part of their continuous professional development are required to fully understand legislation surrounding human rights and equality. Where possible the Trust does support awareness raising events both locally and nationally on such matters as the disabled, Gay and Lesbians and Honour Crime and Forced Marriages. Consideration will be given to increased awareness on the Modern Slavery Act during 2016/17.