

The Modern Slavery Act 2015 is designed to consolidate various offences relating to human trafficking and slavery. The provisions in the act create a requirement for an annual statement to be prepared that demonstrates transparency in supply chains, in line with all businesses with a turnover of greater than £36 million per annum, the NHS is also obliged to comply with the Act.

The legislation addresses slavery, servitude, forced and compulsory labour and human trafficking, and links to the transparency of supply chains.

Section 54 of the Act specifically addresses the point about transparency in the supply chains. It states that a commercial organisation (defined as a supplier of goods and services with a total turnover of not less than £36 million per year) shall prepare a written slavery and human trafficking statement for the financial year. The statement should include steps an organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of the supply chain or its business. The statement must be approved by the board of directors.

The aim of the statement is to encourage transparency within organisations, although it is possible to comply with the provision by simply stating that no steps have been taken during the financial year to ensure that the business and its supply chain is modern slavery free, however the Trust will be implementing procedures to ensure compliance within the next year. It is worth noting that although this may be an acceptable approach for this year's statement, there is an expectation that further work will be undertaken to provide these assurances in years to come. There are potential consequences for those organisations that do not appear to make progress in this area; especially for those that are funded wholly, or in part, by public money.

#### Modern Slavery and Human Trafficking Act 2015 Annual Statement

South Tees Hospitals NHS Foundation Trust is the largest hospital Trust in the Tees Valley serving the people of Middlesbrough, Redcar and Cleveland, Hambleton and Richmondshire and beyond. The Trust runs The James Cook University Hospital in Middlesbrough and the Friarage Hospital in Northallerton. It also runs community services in Hambleton and Richmondshire, Middlesbrough and Redcar and Cleveland. Its workforce of almost 9,000 provides a range of specialist regional services to 1.5million people in the Tees Valley and parts of Durham, North Yorkshire and Cumbria, with a particular expertise in heart disease, trauma, neurosciences, renal services, cancer services and spinal injuries.

The Trust is fully aware of the responsibilities it bears towards patients, employees and the local community. As yet, the Trust has not undertaken any specific training of staff regarding the act, however the procurement department's senior team are all

Chartered Institute of Purchasing and Supply (CIPS) qualified and abide by the CIPS code of professional conduct.

In compliance with the consolidation of offences relating to trafficking and slavery within the Modern Slavery Act 2015, the Trust will be reviewing all of its supply chain with a view to confirming that such actions are not taking place. As such we will be contacting all our key suppliers to request confirmation that they too are compliant with the Act within their own organisations, sub-contracting arrangements and supply chains.

We will also:

- Introduce a “supplier code of conduct” and ask all existing and new suppliers to confirm their compliance
- Add evidence gathering questions into our tender documentation

All clinical and non-clinical staff within the Trust has a responsibility to consider issues regarding modern slavery and incorporate their understanding of these into their day to day practices.

### **Aim**

The aim of this statement is to demonstrate the Trust follows good practice and all reasonable steps are taken to prevent slavery and human trafficking.

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

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

**Signed on behalf of the Board of Directors October 2016**



**Deborah Jenkins**  
Chairperson



**Siobhan McArdle**  
Chief Executive