

Modern Slavery Act Statement 2022/23

INTRODUCTION

This statement is in accordance with s54 of the Modern Slavery Act 2015 and sets out the steps that Solent NHS Trust has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour, and it affects adults and children alike. According to the Modern Slavery and Human Rights Policy and Evidence Centre, the Covid-19 pandemic “has increased vulnerability to modern slavery worldwide as many underlying drivers have worsened.” These drivers include poverty, inequality, and unemployment, things which could continue to get worse with the current Cost of Living crisis.

Solent NHS Trust has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

ABOUT THE ORGANISATION

Created in April 2011, we specialise in providing high quality, best value, community, and mental health services to people living in Portsmouth, Southampton and in some parts of Hampshire. Our team of over 3,400 talented staff work from over 100 clinical locations.

We make a difference by helping people stay safe, well, and independent in, or close to, their own homes. We do this by supporting families to ensure children get the best start in life, providing services for people with complex care needs and helping older people keep their independence. We also provide screening and health promotion services which support people to lead a healthier lifestyle.

We actively promote strong out of hospital services and take an active role in integrating care. Working closely with other trusts, primary care, social care providers and the voluntary sector we make sure care is joined-up and organised around the individual.

We always endeavour to maintain our focus on providing safe, effective, and quality services and pride ourselves on being a learning organisation. We are creating a culture of continuous improvement, providing our staff with the tools, capability, and capacity to continuously improve to ensure we provide people with the best, and most effective, services we can.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Solent NHS Trust is aware of our responsibilities towards patients, service users, employees and the local community and expects that all suppliers to the Trust adhere to the same ethical principles.

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 internal policies and HEART values (Honesty, Everyone Counts, Accountability, Respectful, Teamwork) replicate our commitment to acting ethically and with integrity in all our business relationships.

Currently, all awarded suppliers sign up to our terms and conditions of contract which contain a provision around Good Industry Practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains; and that they conduct their businesses in a manner that is consistent with Solent NHS Trust's policies. In addition, an increasing number of suppliers are implementing the Labour Standards Assurance System (LSAS) as a condition of contract for tenders within high risk sectors and product categories and indeed this has been referenced in the Government's Modern Slavery Strategy. Many aspects of the LSAS align to the seven reporting areas that the Government has outlined and should appear within any slavery and human trafficking statement.

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment and Selection Policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will.
2. Equal Opportunities. We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.
3. Safeguarding Policies. We adhere to the principles inherent within our Safeguarding Children, Young People and Adults at Risk Policy. This provides clear guidance for our employees on how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.
4. Giving Our People the Freedom to Speak Up and to Raise Concerns Policy. We operate a Freedom to Speak Up (whistleblowing) policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.
5. Standards of Business Conduct. This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

Our approach to procurement and our supply chain includes:

- Ensuring that our suppliers are carefully selected through our robust supplier selection criteria/processes
- Requiring that the main contractor provides details of its sub-contractor(s) to enable the Trust to check their credentials
- Randomly requesting that the main contractor provide details of its supply chain
- Ensuring invitation to tender documents contain a clause on human rights issues
- Ensuring invitation to tender documents also contain clauses giving the Trust the right to terminate a contract for failure to comply with labour laws
- Using the standard Supplier Selection Questionnaire (SSQ) that has been introduced (which includes a section on Modern Slavery)

Trust staff must contact and work with the Procurement department when looking to work with new suppliers so appropriate checks can be undertaken.

Supplier adherence to our values. We are zero tolerant to slavery and human trafficking and thereby expect all our direct and indirect suppliers/contractors to follow suit.

Annually we ask our suppliers to verify any changes to their submissions.

Where it is verified that a subcontractor has breached the child labour laws or human trafficking, then this subcontractor will be excluded in accordance with Regulation 57 of the Public Contracts Regulations 2015. The Trust will require that the main contractor substitute a new subcontractor.

TRAINING

Advice and training about modern slavery and human trafficking is available to staff through our mandatory safeguarding children and adults training programmes, our safeguarding policies and procedures, our safeguarding leads, and our safeguarding specialists within the Trust safeguarding team. In 2022, we adopted a new eLearning produced by The Modern Slavery Partnership (running across Hampshire, Isle of Wight, Southampton, and Portsmouth) as an introduction to frontline professionals, with an expectation to combine this with further reading and face to face training. This eLearning includes local information and statistics.

We are looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

OUR PERFORMANCE INDICATORS

Steps/Actions

We intend to continue to take steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking.

In 2022/23, our anti-slavery programme will:

- Support our staff to understand and respond to modern slavery and human trafficking, and the impact that each and every individual working in the NHS can have in keeping present and potential future victims of modern slavery and human trafficking safe.
- Ensure that all NHS staff have access to training on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information and will help staff develop the skills to support individuals who come into contact with health services.
- Work with multi agencies to ensure modern slavery and human trafficking are taken seriously and feature prominently in safeguarding work plans.
- Review all Solent NHS Trust safeguarding policies and training to ensure that Modern Slavery and human trafficking are integral within the content and staff are directed to support and advice as needed.
- Monitor the Modern Slavery (Amendment) Bill to ensure the Trust Modern Slavery Statement reflects any changes made.

This modern slavery and human trafficking statement is reviewed on an annual basis and is approved by Safeguarding Steering Group and Finance and Commercial Group.

Approved: October 2022