

## **MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2022/23**

### **1. INTRODUCTION**

Modern Slavery can take many forms including slavery, servitude and forced or compulsory labour and human trafficking. The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom designed to combat modern slavery in the UK.

Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 requires all commercial operations in the UK with a turnover in excess of £36million to publish an annual statement setting out the steps they take to prevent modern slavery in their business and their supply chains.

The Trust has a zero-tolerance approach to any form of modern slavery, and this statement sets out the steps Portsmouth Hospitals University NHS Trust (the Trust) has taken during the financial year 2022-2023, and are continuing to take, to ensure that modern slavery and human trafficking is not taking place within our business or supply chain.

All members of staff within the organisation have a personal responsibility for the successful prevention of modern slavery and human trafficking, with the Procurement Department taking a lead responsibility for compliance in the supply chain.

We're committed to acting ethically, with integrity and transparency in all business dealings, and putting effective systems in place to safeguard against modern slavery taking place within the business or our supply chain.

### **2. ORGANISATION STRUCTURE, BUSINESS AND SUPPLY CHAINS**

The Trust delivers acute care for the population of approximately 675,000 residents across Portsmouth and South East Hampshire and care for many people beyond. We have over 8,732 staff, 1,200 beds and an annual turnover close to £600 million.

We offer a full range of hospital services from our main site at Queen Alexandra Hospital in Portsmouth and offer a range of outpatient and diagnostic facilities at community sites and local treatment centres across Portsmouth and South East Hampshire. These include:

- St Mary's Hospital: midwifery, dermatology and disablement services
- Gosport War Memorial Hospital: a range of services including Blake Maternity Unit, Minor Injuries Unit and diagnostics
- Petersfield Community Hospital: The Grange Maternity Unit
- Regional services

We are a regional cancer centre, providing some tertiary services to a catchment area of more than 2m people.

We are also proud to host the country's largest Ministry of Defence Hospital Unit, Joint Hospitals Group South, treating current and former members of the armed forces and their families and training clinicians.

We have a reputation for award-winning research and development, pioneering new medical advances to benefit patients.

Following an inspection by the Care Quality Commission in 2022 we retained our rating of 'Good'.

### **3. POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

The Trust has several internal policies to ensure that we are conducting our business in an ethical and transparent manner. These include:

- **Recruitment and Selection Policy:** we operate a robust recruitment policy, including eligibility to work in the UK checks for all directly employed staff. Audits are undertaken by the approved framework for all agency workers engaged via approved frameworks 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. We also require external agencies supplying temporary staff to demonstrate compliance with the legislation. Our Overseas Recruitment Team have robust systems and processes in place for ensuring that our overseas recruitment complies with modern slavery and human trafficking laws.
- **Equal Opportunities:** we have a range of controls to protect staff from poor treatment and/or exploitation, which complies 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.
- **Safeguarding policies:** we adhere to the principles inherent both within our safeguarding child and adult policies. These provide clear guidance so that our employees are clear 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.
- **Raising Concerns (Whistle Blowing) Policy:** we operate a raising concerns 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.
- **Standards of business conduct:** this NHS code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

### **4. DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

NHS South of England Procurement Services (SoEPS) provide a full range of services, including A to Z Strategic and Category Sourcing, Data Management and Consultancy services, Commissioned Healthcare, Operational Procurement, Supply Chain Management, and Advanced Inventory Management to Portsmouth Hospitals University NHS Trust, Isle of Wight NHS Trust and other NHS Clients. In delivering services they:

- Comply with the Public Contract Regulations 2015, including application of the mandatory and discretionary exclusion grounds relating to modern slavery under Reg 57
- Use the CCS Standard Selection Questionnaire which asks suppliers to confirm their compliance with s.54 of the Modern Slavery Act 2015
- Include PPN06/20 Social Value Model requirements within our tenders (one of the policy outcomes is on identifying and managing the risks of modern slavery)
- Use the standard NHS Terms and Conditions when procuring goods and services, which include several requirements and obligations on suppliers in relation to modern slavery.

We undertake appropriate pre-employment checks and require our agencies on approved frameworks to do the same. We protect staff from poor treatment and/or exploitation and comply with all respective laws and regulations including fair pay rates and terms of conditions of employment. We consult and negotiate with Trade Unions on proposed changes to employment, work organisation, and contractual relations.

Our Freedom to Speak Up (FTSU) Guardian supports people to raise and manage concerns in a confidential, supportive and anonymised manner, with appropriate signposting. This is a key role in promoting an open and honest culture of listening and learning, so that concerns raised are welcomed and acted upon in a fair manner.

The FTSU Guardian is developing a broader network of FTSU Advocates and has links with the 'Respect Me' service, staff networks and 'whistleblowing' line. We are growing the awareness of 'Freedom to Speak Up' across the Trust and have implemented the Health Education England Freedom to speak up training modules 'speak up, listen up and follow up' and are working towards ensuring these form part of 'essential/mandatory training' for all staff over the coming year.

The Trust has a specialist Safeguarding Team which supports the organisation to ensure that we have robust safeguarding arrangements across all areas.

## **5. RISK ASSESSMENT AND MANAGEMENT**

We have a robust policy detailing how the Trust effectively manages risks; our aim is to promote a risk awareness culture in which all risks are identified, assessed, understood and proactively managed. This will promote a way of working that ensures risk management is embedded in the Trust's culture and becomes an integral part of the Trust's objectives, plans, practices and management systems.

## **6. KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN**

- **KPI 1** - Requirement for Procurement staff to complete annual training on modern slavery.
- **KPI 2** - Reporting any suspected modern slavery violations to an Executive Director immediately upon detection and investigating the reports within 72 hours
- **KPI 3** - Modern Slavery Assessment Tool will be completed for all new requirements over £2m which are assessed as medium to high risk of Modern Slavery
- **KPI 4** - Documented evidence of Modern Slavery as a standing Agenda item with Supplier Relationship meeting on a quarterly basis
- **KPI 5** - The recruitment process for substantive staff is audited on a regular basis (average every two years), by the Trust's auditors. This includes pre-employment checks and the rights to work in the UK
- **KPI 6** - Monitoring of incidents and Freedom to Speak Up themes to identify any concerns relating to modern slavery

## **7. TRAINING ON MODERN SLAVERY AND TRAFFICKING**

Training is provided as part of our Safeguarding training. Staff are also able to access training provided by our Multi-agency Children's Partnerships and Safeguarding Adults Boards.

We have teams responsible for safeguarding of adults and children, to whom staff are responsible for reporting of concerns and who will train staff on how to recognise issues of concern.

## **8. REVIEW OF EFFECTIVENESS**

In 2022/23, no concerns were identified by the Trust or brought to the Trust's attention indicating non-compliance with the Modern Slavery Act 2015. We intend to continue to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in our supply chains. In 2023/24, our anti-slavery programme will include:

- continuing to effectively monitor our contracts and supply chain to ensure that new and existing suppliers are compliant with the Modern Slavery Act 2015;

- continuing to have robust recruitment systems and processes in place including for overseas recruitment and temporary workers;
- strengthening our Freedom to Speak Up processes to ensure all staff feel confident and safe to raise concerns;
- work with partners like the local councils and the police, as required, to put robust systems in place to
- continuing to deliver safeguarding training and specialist support for all our staff; and implementing any new guidance or best practice to

## 9. BOARD OF DIRECTORS APPROVAL

The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. The Board of Directors has considered and approved this statement on 31 May 2023 and will continue to support the requirements of the legislation.



Melloney Poole, OBE  
Chairman  
04 July 2023



Penny Emerit  
Chief Executive  
04 July 2023

**Signed on Behalf of the Board**