

## **Modern Slavery Act – 2021/2022 Annual Statement**

At The Hillingdon Hospitals NHS Foundation Trust, we are committed to ensuring that no modern slavery or human trafficking takes place in any part of our business or our supply chain.

We are fully aware of the responsibilities we bear towards our service users, employees and local communities. We are guided by a strict set of ethical values in all of our business dealings and expect our suppliers (i.e. all companies we do business with) to adhere to these same principles.

We have zero tolerance for slavery and human trafficking. Staff are expected to report concerns about slavery and human trafficking and management will act upon them in accordance with our policies and procedures.

The Hillingdon Hospitals NHS Foundation Trust supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role the NHS has to play in both combatting it, and supporting victims. In particular, we are committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses. Steps taken to mitigate the risk of Modern slavery are outlined in the sections below.

### **People**

- Appropriate pre-employment checks on directly employed staff and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff
- 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 of Conditions of employment and access to training and development opportunities
- Consultation and negotiation with Trade Unions on proposed changes to employment, work organisation and contractual relations
- Appropriate adult and children's safeguarding policies are in place to ensure staff are alert to, and report any concerns about patients who may be subject to human trafficking or modern slavery

### **Speaking up at the Trust**

- The Trust believes that every member of staff has a duty to raise concerns at the earliest reasonable opportunity about the provision of care or any other malpractice within the trust where care and/or behaviour/conduct is believed to be inadequate or unacceptable. In addition staff have duties imposed upon them to raise such concerns by their respective professional regulatory bodies, such as the GMC, NMC, ACCA etc.

### **Procurement and our supply chain**

- Purchase most of our products from UK or EU based firms, who may also be required to comply with the requirements of the UK Modern Slavery Act (2015) or similar legislation in other EU states.
- Purchase a significant number of products through NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour.
- Where possible and consistent with the Public Contracts Regulations, build long-standing relationships with suppliers.

## **Training**

- Advice and training about modern slavery and human trafficking is available to staff through our Safeguarding Children and Adults training, our Safeguarding policies and procedures and our Safeguarding leads.

## **Board Approval**

This statement has been approved by the Trust Board, who will review and update it on an annual basis

Approved by THHFT Board on 06 April 2021.