

Southern Health NHS Foundation Trust Modern Slavery Act statement 2018

1. Introduction

At Southern Health 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. This statement sets out the steps we have taken to understand all the potential modern slavery and human trafficking risks throughout our organisation and business and how we intend to implement effective systems and controls during the year ending March 2019.

2. Organisational Structure

Southern Health NHS Foundation Trust has nearly 6000 staff providing community health, mental health and learning disability services for people across most of Hampshire. Our wide range of services provide support and treatment for both adults and children and we deliver this care in specialised settings, community hospitals, health centres, GP surgeries and in our patients' homes. We work closely with a number of partners, including commissioners, local councils, NHS England and schools to deliver care to our communities.

Further information about our services can be found at: www.southernhealth.nhs.uk

3. Our Policies

We have zero tolerance for slavery and human trafficking and are fully aware of our responsibilities towards our service users, employees and local communities. We expect all the companies we do business with to share the same ethical values. We have a number of policies which support us in conducting business in an ethical manner, including:

- Recruitment and Selection Policy
- Equality, Diversity and Human Rights Policy
- Safeguarding Adults and Children Policies
- Freedom to Speak Up: Raising Concerns (Whistleblowing) Policy
- Procurement Policy
- Grievance Policy.

All new policies are reviewed within 12 – 18 months of issue to ensure they are working effectively and reviewed again every 4 years or earlier if relevant laws change or new evidence or guidance becomes available.

We also have an impartial Freedom to Speak Up Guardian who supports staff to raise any concerns.

4. Due Diligence

To identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain we:

- ♦ Undertake appropriate pre-employment checks on directly employed staff including conducting eligibility to work in the UK.

- ♦ Ensure all staff are protected from poor treatment and/or exploitation by complying 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.
- ♦ Use agency staff from agencies on approved frameworks so that we are assured that pre-employment clearance has been obtained to safeguard against human trafficking or individuals being forced to work against their will. If there is not an available worker from a framework agency, this is escalated to senior managers and local pre-employment checks, including the right to work in the UK, are sought.

Our supply chain includes procurement of agency staff, medical services, medical and other consumables, facilities maintenance, utilities and waste management to a total of approximately £129M per year of which around £27M is spend with other NHS bodies.

We purchase most products through NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour. Where we deal with other NHS providers, their compliance with the Act is assumed.

For our existing service contracts:

- We have written to all our commercial suppliers of service contracts to gain assurance that they are compliant with the Modern Slavery Act 2015. Their responses are monitored and if we do not receive adequate assurance we will assess further through ongoing contract reviews. If concerns are raised, these will be escalated to the appropriate authorities
- For high risk (low margin, unskilled labour) service contracts ongoing assurance is sought at contract review meetings.

For new service contracts:

- We include specific clauses in all Terms and Conditions that reflect our obligations under the Modern Slavery Act 2015
- We ensure that our suppliers are carefully selected through our robust supplier selection criteria/processes in accordance with Official Journal of the European Union guidance and the Trust's policy and procedure.
- We require that the main contractor provides details of its sub-contractor(s) to enable the Trust to check their credentials
- Where a tender price is significantly lower than other bids, or gives other grounds for doubting the credibility of the bid, a written explanation of the offer is sought. If the evidence provided does not satisfactorily account for the bid price or the offering, the bid will be rejected.

5. Effective action taken to address modern slavery

We have adapted our contract database to ensure we know which suppliers have given us assurance that they are compliant with the Modern Slavery Act 2015.

We have a team of practitioners who have received additional training regarding modern slavery who are ready to respond to the health needs of victims of modern slavery as required.

6. Training

Information about modern slavery and human trafficking, including how to identify and respond to concerns and how to report suspected cases of modern slavery is included in our Safeguarding Children and Adults training which all staff have to complete when starting work with the Trust and update every 3 years. Over 96% of staff are currently compliant with this requirement.

The learning outcomes for the training match the requirements suggested by the Intercollegiate Documents for safeguarding children and adults¹

We have also provided additional, targeted training for members of staff who are likely to identify modern slavery concerns in the course of their work. We provide bespoke training to teams who identify a need for further information and support.

We marked Antislavery Day on October 18th 2017 by sending out information across the whole Trust about modern slavery in the UK and highlighting the Modern Slavery Helpline

Advice and support regarding modern slavery concerns is available to all staff from safeguarding policies and procedures and our safeguarding adults support and advice line, which is run by members of our Trust safeguarding team.

We have a page dedicated to information about modern slavery on our staff website, which reminds staff how they might recognise a victim of modern slavery and what they should do to help.

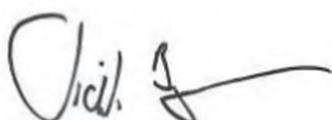
This statement was discussed at the Southern Health NHS Foundations Trust Safeguarding Forum on 27th April 2018 and agreed by the Quality and Safety Committee on 8th May 2018.

**Southern Health NHS Foundation Trust: MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDED 2018
ISSUED PURSUANT TO SECTION 54 OF THE MODERN SLAVERY ACT 2015**

Signed:

Position: CEO

Date: 24.5.18



¹ Royal College of Paediatrics and Child Health 2014 Safeguarding children and young people: roles and competences for health care staff
5 NHS England 2016 Safeguarding Adults: Roles and competences for health care workers