

Modern Slavery and Human Trafficking Statement

Definition of Offences

Slavery, Servitude and Forced or Compulsory Labour

A person commits an offence if:

- The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or;
- The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

Human Trafficking

A person commits an offence if:

- The person arranges or facilitates the travel of another person (victim) with a view to being exploited.
- It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

Exploitation

A person is exploited if one or more of the following issues are identified in relation to the victim;

- Slavery, servitude, forced or compulsory labour.
- Sexual exploitation
- Removal of organs
- Securing services by force, threats and deception
- Securing services from children, young people and vulnerable persons.

Modern Slavery and Human Trafficking Statement

In accordance with the Modern Slavery Act 2015, Hounslow and Richmond Community Healthcare NHS Trust (HRCH) makes the following statement regarding the steps it has taken in the financial years 2015/16 and 2016/2017 to ensure that Modern Slavery i.e. slavery and human trafficking, is not taking place in any part of its own business or any of its supply chains.

HRCH is committed to ensuring that there is no Modern Slavery or Human Trafficking in our supply chains or in any part of our business.

We are committed to social and environmental responsibility and have zero tolerance for Modern Slavery and Human Trafficking. Any identified concerns regarding Modern Slavery and Human Trafficking are escalated as part of the Trust's safeguarding process working in conjunction with our partner agencies.

The policies in relation to slavery and human trafficking

- Human trafficking and modern slavery guidance is included in the trust's safeguarding policies.
- Modern slavery is incorporated within HRCH's Safeguarding Adults and Safeguarding Children's Policies. In addition, modern slavery is covered/referenced within the Safeguarding Children and Adult mandatory training from Levels 1-3, which applies to all staff employed by HRCH.
- The response to human trafficking and modern slavery concerns are coordinated under the safeguarding adult and/or safeguarding children process. The Police are the lead agency (a national framework is in place to assist in the formal identification and help to coordinate the referral of victims to appropriate services, known as the National Referral Mechanism) and staff are directed to the appropriate Home Office website for further information.
- The referral process for adults/ children at risk and links to both HRCH Safeguarding Adults and Children Board (LSCB/LSAB) are located on the safeguarding section of HRCH website.
- HRCH has systems to encourage the reporting of concerns and the protection of whistle blowers and in addition has dedicated named adult and children's safeguarding leads plus a dedicated Speaking Up Guardian, Christopher Hall.
- A review is undertaken of all safeguarding referrals via the HRCH incident reporting system and presentation of data is shared at the trust Quality Governance Board Sub-Committee and Safeguarding Committees.

- Working in partnership with multi-agency partners leading on this agenda in London, HRCH is represented on the NWL Modern Slavery working group, which is a sub-committee of the LSAB.
- The trust Employment Checks Policy ensures that all employment checks are in line with National NHS Employment Checks Standards (which include identification, right to work, qualification and registration and reference checks. The trust also checks all new starters using an ID scanner to further verify the ID documentation.
- In addition, the trust requires all external agency engagements to be made via framework approval supplier who are audited centrally and required to confirm that all staff have been checked for their right to work, identification, qualification and registration in line with NHS employment check standards commensurate to trust processes.

HRCH staff must

- Undertake safeguarding training appropriate to their roles and responsibilities.
- Work with the procurement service when looking to work with new suppliers so appropriate checks relating to modern slavery can be undertaken.

Working with Suppliers

- HRCH, via its contracted procurement service Essentia, will ensure its supplier base and associated supply chain that provides goods and/or services to HRCH has taken the necessary steps to ensure modern slavery is not taking place.
- NHS Supply Chain has a Supplier Code of Conduct which outlines main principles for suppliers in the area of labour standards and worker welfare. All suppliers are expected to adhere to these principles which address issues such as child labour, forced labour, wages, working hours as well as health and safety. The Supplier Code of Conduct is a contractual requirement and has been part of all NHS Supply Chain Framework Agreements since 2009.
- The procurement service is committed to ensuring that this is monitored and reviewed with its supplier base..
- The procurement service's senior team are all Chartered Institute of Purchasing and Supply (CIPS) qualified and uphold the CIPS's code of professional conduct and practice relating to procurement and supply. All members of the procurement team are required to undertake safeguarding training at a level appropriate to their roles and responsibilities.
- In addition, template commercial agreements will be updated by the procurement service to include an obligation that suppliers will comply with the Act and ensure that their suppliers and sub-contractors will too.
- The procurement service will identify and prioritise high risk areas in the supply chain utilising guidance and resources as available, especially the Chartered Institute of Purchasing and Supply.
- There are no specific obligations placed on public sector procurers under the Act, albeit there will be an expectation that procurers seek some confirmation that suppliers are complying with their obligations, as applicable.

HRCH follows good practice, ensuring all reasonable steps are taken to prevent slavery and human trafficking and will continue to support the requirements of the Modern Slavery Act 2015 and any future legislation.