

## Meetings of the NHS England and NHS Improvement Boards, held in public

**Meeting Date:** 28 March 2019

**Agenda item:** 11

**Report by:** Ruth May, Chief Nursing Officer

**Report on:** Slavery and Human Trafficking Statement 2018/19

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### Decision Making Responsibility:

NHS England	<input checked="" type="checkbox"/>
NHS Improvement	<input type="checkbox"/>
NHS England and NHS Improvement	<input type="checkbox"/>
N/A - joint discussion	<input type="checkbox"/>

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### Patient and Public Involvement:

This is a statutory function of NHS England in line with the Modern Slavery Act 2015.

### Purpose of Paper:

To present NHS England's Slavery and Human Trafficking Statement for 2018/19 to the Board for approval, in line with requirements of the Modern Slavery Act 2015.

### The Board invited to:

- Approve the Slavery and Human Trafficking Statement for 2018/19

## Slavery and Human Trafficking Statement 2018/19

### Purpose

1. In line with requirements of the Modern Slavery Act 2015, this paper presents NHS England's Slavery and Human Trafficking Statement for 2018/19 to the Board for approval.

### Background

2. The Modern Slavery Act 2015 introduced changes in UK law, focused on increasing transparency in supply chains. Specifically, large businesses are now required to disclose the steps they have taken to ensure their business and supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking).
3. Commercial organisations that supply goods or services and have a minimum turnover of £36 million are required to produce a 'slavery and human trafficking statement' each financial year. This should set out the steps (if any) taken to ensure modern slavery is not taking place in the organisation's own business and its supply chains. It needs to be approved at Board level, signed by a Director and published in a prominent place on the organisation's website.

### Analysis since last update

4. As a result of the commercial undertakings of commissioning support units, NHS England had non-NHS income over the required threshold in 2018/19 and therefore meets the requirements for producing a slavery and human trafficking statement. This approach is in line with guidance produced by the Department of Health and Social Care on application of the Act by NHS bodies, and has been agreed in discussion with the National Audit Office.
5. The proposed Slavery and Human Trafficking Statement for NHS England 2018/19 is attached as **Appendix A**. It has been drafted with input from Transformation and Corporate Development, Finance, Legal, Governance, People and OD Directorates.

### Next steps or timeline

6. Following approval, the statement will be published on the NHS England website. Preparations for the 2019/20 statement will be managed as part of the statutory annual reporting cycle.

### Recommendations

7. The Board approves the publication of the Slavery and Human Trafficking Statement for 2018/19.

**Author** Hilary Garratt, Deputy CNO and Director of Nursing NHSE  
**Date:** February 2019

**NHS England****Our Slavery and Human Trafficking Statement for 2018/19****About us**

NHS England provides system leadership across the NHS in England. We share out more than £100 billion in funds and hold organisations to account for spending this money effectively for patients and efficiently for the tax payer. We operate through central and regional teams and host other support services, operating as a single organisation. We also work closely with partner organisations that provide regulatory and support services to the health and care system.

Further details about what we do can be found [our website](#).

**Current policies and initiatives**

NHS England fully 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 strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses. Steps taken to date include:

**People**

- We confirm the identities of all new employees and their right to work in the United Kingdom, and pay all our employees above the National Living Wage
- Our Respect at Work, Grievance and Voicing your Concerns for Staff policies additionally give a platform for our employees to raise concerns about poor working practices.
- We have been using social media to raise awareness and there has since been investment in training to ensure front line practitioners are aware of and able to respond to incidents of modern slavery within care settings.
- We have sustained close links with the Anti-Slavery Commissioner and the UK Modern Slavery Training Delivery Group to ensure the NHS is able to play a full part in eradicating Modern Slavery from the UK.
- We are supporting an NHS modern slavery network so that health care professionals can share best practice and work to support the identification of modern slavery in health settings.

**Whistleblowing in the NHS**

- We are a Prescribed Person under the Public Interest Disclosure (Prescribed Persons) Order 2014, meaning primary care staff working at GP surgeries, opticians, pharmacies and dental practices can raise concerns about inappropriate activity with us directly. We assign any concerns for further investigation and offer support to individuals that have suffered fiscal or professional detriment as a result of whistleblowing.

## **Procurement and our supply chain**

- Our procurement approach follows the Crown Commercial Service standard and includes a mandatory exclusion question regarding the Modern Slavery Act 2015.
- When procuring goods and services, we additionally apply NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with relevant legislation.
- To date all Commercial and Procurement staff have received training on ethical and staffing issues in procurement. Ethical and staffing issues form a key part of our induction for new entrants to the Commercial team.

NHS England Business Case approval process now includes a question on Social Value which must be considered before the budget for a proposed procurement is approved. This question is supported by explanatory narrative, which makes direct references to staff rights and the Modern Slavery Act.

## **Review of effectiveness**

We intend 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 2019/20, our anti-slavery programme will also:

- support all NHS 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 NHS funded organisations to ensure modern slavery and human trafficking are taken seriously and features prominently in safeguarding work plans.
- review all NHS England safeguarding policies and MAST training to ensure that Modern Slavery and human trafficking are integral within the content and staff are directed to support and advice as needed.

**Simon Stevens, Chief Executive, NHS England**  
**[DATE TO BE INSERTED]**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to NHS England, including Commissioning Support Units. The Board approved this statement at its meeting on **[DATE TO BE INSERTED]**

Further details can be found at:

<https://www.england.nhs.uk/ourwork/safeguarding/our-work/modern-slavery/>.