

Paper: CB.15.12.2016/06

## NHS ENGLAND – BOARD PAPER

**Title:**

Slavery and Human Trafficking Statement 2015/16

**Lead Director:**

Karen Wheeler, National Director: Transformation and Corporate Operations

**Purpose of Paper:**

To present NHS England's Slavery and Human Trafficking Statement for 2015/16 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 2015/16

## Slavery and Human Trafficking Statement 2015/16

### Purpose

1. In line with requirements of the Modern Slavery Act 2015, this paper presents NHS England's Slavery and Human Trafficking Statement for 2015/16 to the Board for approval.

### Background

2. The Modern Slavery Act 2015 has 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 on 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 2015/16 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 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 2015/16 is attached as **Appendix A**. It has been drafted with input from Transformation and Corporate Operations, Finance and Nursing Directorates, and has been subject to legal review.

### Next steps or timeline

6. If approved, the statement will be published on the NHS England website. Preparations for the 2016/17 statement will be managed as part of the statutory annual reporting cycle.

### Recommendations

7. That the Board approve publication of the Slavery and Human Trafficking Statement for 2015/16.

**Author**            **Steve Verdon, Director of Governance**  
**Date:**            **November, 2016**

## Our Slavery and Human Trafficking Statement for 2015/16

### About us

NHS England leads 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 work through central and regional teams, commissioning support units and other support services which we host - 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 on our website at [www.england.nhs.uk/about/](http://www.england.nhs.uk/about/).

### 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.
- Respect at Work, Grievance and Voicing your Concerns for Staff policies additionally give a platform for employees to raise concerns about poor working practices.

#### *Whistleblowing in the NHS*

- We are a Prescribed Person under the Public Interest Disclosure Order 1999, 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 supplier selection process follows government guidelines and includes a mandatory question regarding the Modern Slavery Act.
- When procuring goods and services, we generally 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.

### 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 procurement and supplier management functions.

In 2016/17, our anti-slavery programme will also work to:

- support 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 formal training on modern slavery and human trafficking which will provide the latest information and the skills to deal with it
- work with NHS funded organisations to ensure modern slavery and human trafficking are taken seriously and features prominently in safeguarding agendas.

Further details can be found at: <https://www.england.nhs.uk/ourwork/safeguarding/our-work/modern-slavery/>.

**Simon Stevens**

Chief Executive, NHS England

Date [TBC]

*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 [insert date] 2016.*