

Appendix A

2022/23 Modern Slavery and Human Trafficking Statement

1. Introduction

Section 54 of the Modern Slavery Act 2015 requires all organisations to set out the steps they have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

The aim of this Statement is to demonstrate that West Hertfordshire Hospitals NHS Trust follows good practice, and all reasonable steps are taken to prevent slavery and human trafficking.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the procurement department taking responsibility lead for overall compliance.

2. Structure and supply chains

The Trust provides acute healthcare services to a core catchment population of approximately half a million people living in west Hertfordshire and the surrounding area. It also provides a range of more specialist services to a wider population, serving residents of north London, Bedfordshire, Buckinghamshire and east Hertfordshire.

The Trust applies the NHS standard Terms and Conditions for PO's, Goods, Services and the provision of Goods and Services which are used for the majority of procurements and require suppliers to comply with relevant legislation. A large proportion of the goods and services procured are sourced through Government supply frameworks and contracts which also require suppliers to comply with relevant legislation. Social value considerations are also included in specifications and evaluation criteria where this is appropriate and legal to do so. The Trust procures goods and services from a range of providers and while contracts may vary from small one-off purchases to large service contracts, all spend is, with very few exceptions, subject to the NHS Standard terms and conditions which holds the supplier to adhere to the requirements of Modern Slavery, Environmental, social and labour law requirements.

3. Our policy on slavery and human trafficking

The Trust has zero tolerance of slavery and human trafficking and is committed to maintaining and improving systems, processes and policies to avoid complicity in human rights violation and to prevent slavery and human trafficking in its supply chain.

The Trust's policies, procedures, governance and legal arrangements are robust, ensuring that proper checks and due diligence are applied in employment procedures to ensure compliance with this legislation. The Trust also conforms to the NHS employment check standards within

its workforce recruitment and selection practices, including through managed service provider contract arrangements.

4. Due diligence

To identify and mitigate the risks of modern slavery and human trafficking in its own business and its supply chain, the Trust:

- Undertakes 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.
- Implements a range of controls to protect staff from poor treatment and/or exploitation, which complies 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.
- Consults and negotiates with trade unions on proposed changes to employment, work organisation and contractual relations.
- Purchases most of its products from UK or EU based firms, who **are** also required to comply with the requirements of the UK Modern Slavery Act (2015) or similar legislation in other EU states.
- Purchases a significant number of products through the NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour.
- The Trust requires all suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through its purchase orders and tender specifications.
- Upholds professional codes of conduct and practice relating to procurement and supply, including through its procurement team's membership of the Chartered Institute of Procurement and Supply.
- Where possible and consistent with the Public Contracts Regulations, the Trust builds long-standing relationships with suppliers.

5. Training


The Trust has training in place to ensure frontline staff are vigilant to any potential cases of slavery and human trafficking and are equipped to take the appropriate action. Further information on modern slavery and human trafficking is available through the Trust's safeguarding children and adults' policies and procedures and the safeguarding team.

6. Aim

The aim of this Statement is to demonstrate that the Trust follows good practice, and all reasonable steps are taken to prevent slavery and human trafficking. All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the procurement department taking responsibility lead for compliance in the supply chain.

7. Board approval

The Board has considered and approved this Statement and will continue to support the requirements of the legislation. The Statement has been reviewed in 2023 and it will continue to be reviewed and updated on an annual basis.



Matthew Coats
Chief Executive

Dated: 1 June 2023