

## **MODERN SLAVERY ACT 2015**

The Modern Slavery Act 2015 is designed to consolidate various offences relating to human trafficking and slavery. The provisions in the act create a requirement for an annual statement to be prepared that demonstrates transparency in supply chains. In line with all businesses with a turnover greater than £36 million per annum, the NHS is also obliged to comply with the Act.

### **Summary**

The legislation addresses slavery, servitude, forced or compulsory labour and human trafficking, and links to the transparency of supply chains.

Section 54 of the Act specifically addresses the point about transparency in the supply chains. It states that a commercial organisation (defined as a supplier of goods or services with a total turnover of not less than £36 million per year) shall prepare a written slavery and human trafficking statement for the financial year. The statement should include the steps an organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of the supply chain or its business. The statement must be approved by the board of directors.

The aim of the statement is to encourage transparency within organisations, although it is possible to comply with the provision by simply stating that no steps have been taken during the financial year to ensure that the business and supply chain is modern slavery free. It is worth noting that although this may be an acceptable approach for this year's statement, there is an expectation that further work will be undertaken to provide these assurances in years to come.

There are potential consequences for those organisations that do not appear to make progress in this area; especially for those that are funded wholly, or in part, by public money.

### **Assurance**

The Trust will be required to review and /or prepare a similar statement on an annual basis. To support the production of the statement assurance mechanisms will be put in place, including the use of Internal Audit. Internal Audit's work would include a review of the systems in use by the Trust that seek appropriate assurance from other organisations. These assurances will be included in Internal Audit reports that will be discussed at the Audit and Risk Committee.

Chairman: Andrew Haigh  
Chief Executive: Owen Williams



compassionate  
care



## **Modern Slavery and Human Trafficking Act 2015 Annual Statement**

Section 54 of the Modern Slavery Act 2015 requires all organisations to set out the steps it has 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 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 overall compliance.

Calderdale and Huddersfield NHS Foundation Trust provides acute hospital and specialist healthcare services from its two main hospitals, Calderdale Royal Hospital and Huddersfield Royal Infirmary. The Trust also provides a range of community services in Calderdale. Our annual turnover is over £330 million.

The Trust has internal policies and procedures in place that assess supplier risk in relation to the potential for modern slavery or human trafficking. The top 80% of suppliers nationally, affirm their own compliance with the modern slavery and human trafficking act within their own organisation, sub-contracting arrangements and supply chain. During 2016 the Trust will be writing to all suppliers requesting them to affirm their compliance with the legislation.

Internal audit undertake an annual audit on financial control as part of their audit plan. The audit includes a statutory compliance element. In future this will include the modern slavery and human trafficking act requirements.

The procurement department's senior team are all Chartered Institute of Purchasing and Supply (CIPS) qualified and abide by the CIPs code of professional conduct. Over the next year, specific training will be provided for the Trusts internal supply chain management related to modern slavery and human trafficking.

Information on modern slavery and human trafficking has been shared through the Trust's internal communications methods. Human Trafficking training is delivered as part of the Level 2 eLearning package and Level 3 Safeguarding Training. Some staff have also attended 'Hope for Justice's' bespoke training regarding Human Trafficking.

The Trust has evaluated the principle risks related to slavery and human trafficking as:

- Lack of assurances from suppliers
- Lack of appropriate clauses in contracts
- Reputational.

Performance indicators will be developed during the year to provide the reader with an ability to assess the effectiveness of the statement.

The Board of Directors has considered and approved this statement and will continue to support the requirements of the legislation.



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Andrew Haigh  
Chair



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Owen Williams  
Chief Executive