

## Cumbria, Northumberland, Tyne and Wear NHS Foundation Trust

### Modern Slavery Statement June 2024

#### 1. Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Cumbria, Northumberland, Tyne and Wear NHS Foundation Trust (the Trust or CNTW) has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain.

There are many definitions of “modern slavery”. Transparency International defines it as when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage.

It involves the recruitment, movement, harbouring or receiving of children, women, or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of, or within the UK, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude or even organ harvesting.

It is easy to think that modern slavery is a problem in other parts of the world and “doesn’t happen here”. But official figures suggest around 10,000 people in the UK are victims. Slavery experts believe the number is more like 100,000. In 2022, almost 17,000 potential victims of modern slavery were referred to the UK’s National Referral Mechanism (NRM), representing a 33% increase on the previous year and the highest number of referrals since the NRM began in 2009.

The NHS procures a wide variety of goods and services, and some of the relevant sectors are certainly vulnerable to modern slavery. For example, there have been prosecutions in the UK in recent years relating to firms producing beds, garments, and food products – all major spend areas for many NHS Trusts.

The Trust has a zero-tolerance approach to any form of modern slavery or human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chain.

#### 2. About the Organisation

Cumbria, Northumberland, Tyne and Wear NHS Foundation Trust is one of the largest specialist providers of mental health and disability services within the UK. We employ nearly 9,000 staff and serve a local population of around 1.7 million people and have an annual turnover of around £600 million.

We work from over 70 sites across Cumbria, Northumberland, Newcastle, North Tyneside, Gateshead, South Tyneside and Sunderland. We also provide a number of regional and national specialist services to England, Ireland, Scotland and Wales. Working across eight

Local Authorities and a partner member of North East and North Cumbria Integrated Care System.

### **3. Our Commitment**

CNTW condemns slavery of all forms and is fully committed to working with suppliers within our supply chain to support the human rights and welfare of the employees working alongside CNTW. We expect organisations with whom we do business to adopt and enforce policies that comply with this legislation; and would immediately seek to terminate our relationship with a supplier where evidence of a failure to comply with our policies was discovered.

CNTW is committed to ensuring that those involved within the supply chain of our business operations are working of their own free volition, in the delivery of high-quality services to all customers through a skilled and experienced workforce. CNTW will endeavour to make a conscious effort to monitor operations to ensure no individual is taken advantage of. It is the intention of CNTW to train relevant staff to recognise and report instances where the freedom of an individual is questioned.

### **4. Arrangements to prevent slavery and human trafficking**

The Trust is committed to ensuring there is no modern slavery or human trafficking in our organisation, our supply chains, or any part of our business activity. Our approach forms a key element of our wider commitment to social and environmental responsibility and modern slavery policy also forms part of our safeguarding strategy and arrangements.

Our approach includes internal policies to ensure that we are conducting business in an ethical and transparent manner. They include the following:

- **Recruitment**

CNTW complies with external policies and processes for safe recruitment and where necessary relevant employment checks will be conducted. This includes conducting eligibility to work in the UK checks for all directly employed staff. External agencies are sourced through NHS nationally approved frameworks and are audited to provide assurance that pre-employment clearance has been obtained for agency staff to safeguard against human trafficking or individuals being forced to work against their will.

- The approach for internal recruitment follows robust processes which are in line with UK Employment Laws including 'right to work' document checks and contracts of employment. Our Pay structure is from national collective agreements and is based on equal pay principles.

- **Trust policies and procedures**

All policies and procedures are developed alongside the relevant subject matter expert and signed off at an appropriate level within the Organisation.

- **Safeguarding policies**

The Trust is committed to ensuring adherence to the principles set out with both Safeguarding Children and Young People and Safeguarding Adults policies. These provide clear guidance so that our employees are aware how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.

- **Freedom to Speak up**

We operate a Freedom to Speak Up policy, so that all employees know that they can raise concerns, and how to raise concerns, about how colleagues or people receiving our services are being treated without fear of reprisals. This includes raising concerns about practices within our business or supply chain. This supports The Public Interest Disclosure Act 1998 (PIDA), which protects whistleblowers from detrimental treatment by their employer as a result of making a public interest disclosure.

- Arrangements are in place to support raising concerns via the Freedom to Speak Up process also support good practice and protect workforce rights further. The Trust is also ensuring appropriate mechanisms to regularly review and monitor progress on promoting and supporting equality, diversity and inclusion within CNTW. To ensure equal opportunities we have a range of controls to protect staff from poor treatment or exploitation and we comply with all respective laws and regulations. This includes provision of fair pay rates, fair terms and conditions of employment and access to training and development opportunities.

## **5. Due Diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chain, we have taken steps to enable us to:

- Establish and assess areas of potential risk in our business and supply chain.
- Monitor potential risk area in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains through the expectation that each entity in the supply chain, at least adopt 'one-up' due diligence on the next link in the chain as it is not practical for us to have a direct relationship with all links in the supply chain.
- Provide adequate protection for whistle-blowers.

Most of our purchases are against existing supply contracts or frameworks which have been negotiated under the NHS Standard Terms and Conditions of contract which have the requirement for Suppliers to have suitable anti-slavery and human trafficking policies and processes to be in place.

We understand that our biggest exposure to Modern Slavery is associated with recruitment processes and recognise the importance of raising awareness within the business to identify any potential situations. Our Internal Audit plan also incorporates testing of elements of the recruitment process.

Due diligence is expected throughout the whole recruitment process and throughout the workers employment within the business. Procedures are reviewed to eliminate risk and gain compliance across all business locations.

## **6. Training and Awareness**

All new internal employees must attend a local induction session which will provide information on the organisation, our values, policies, and procedures and include information associated with prevention of modern slavery. Existing staff will be made aware of modern slavery through local briefings planned through the year.

Our Procurement and Logistics service employ Chartered Procurement and Supply Professionals who are qualified as Fellows and Members of the Chartered Institute of Procurement and Supply who have passed the Ethical Procurement and Supply Final Test which is attached to this Professional Registration.

## **7. Indicators of Performance**

We will gain assurance on the effectiveness of the steps that we are taking outlined in this statement, to ensure that slavery and/or human trafficking is not taking place within our business or supply chain and is committed to ensuring we always operate towards the best practices. By implementing and continually reviewing checks which minimise the risk of any form of modern slavery taking place within our operations, we can support the relevant government authorities in reporting any identified situations, and as such protect our business, our clients' businesses and first and foremost, our workers.



James Duncan

**Chief Executive on behalf of the Board of Directors**

**Cumbria, Northumberland, Tyne and Wear NHS Foundation Trust**

**June 2024**