

# Modern Slavery and Human Trafficking Policy Statement

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| <b>Category Tower Service Provider:</b> | Leeds and York Partnerships NHS Foundation Trust (NOE CPC) |
| <b>Date:</b>                            | 18 May 2022  |
| <b>Version:</b>                         | 1.0  |
| <b>Status:</b>                          | Draft  |

## Document Governance

|                                  |             |
|----------------------------------|-------------|
| <b>Document Owner:</b>           | Leigh Pratt |
| <b>Document Date:</b>            | 18 May 2022 |
| <b>Document Current Version:</b> | 1.0         |
| <b>Document Status:</b>          | Final       |

## Document Review

|                             |          |
|-----------------------------|----------|
| <b>Date of next review:</b> | May 2023 |
|-----------------------------|----------|

## Document version control

| Version | Date             | Revisions               | Author                           |
|---------|------------------|-------------------------|----------------------------------|
| V0.1    | 10 December 2020 | First Draft             | Rob Watson                       |
| V0.2    | 14 December 2020 | Second Draft            | Leigh Pratt                      |
| V0.3    | 14 December 2020 | Branding and formatting | Kate Warman                      |
| V0.4    | 15 December 2020 | Review and amend        | Kevin Chidlow                    |
| V0.5    | 15 January 2021  | Final version published | Leigh Pratt                      |
| V0.6    | 15 January 2022  | Review and amend        | Kevin Chidlow & Stephen Sercombe |
| V1.0    | 18 May 2022      | Final version published | Leigh Pratt                      |

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### 1. Policy Statement

1.1. NHS North of England Commercial Procurement Collaborative (NOE CPC) are committed to acting ethically, and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls, to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains. As an NHS organisation we adhere to a robust set of ethical values and policies from our host organisation Leeds and York Partnership NHS Foundation Trust and we use these policies for our commercial, recruitment and management activities. These are:

- LYPFT Anti-Fraud, Bribery and Corruption
- LYPFT Conflict of Interest
- LYPFT Equality, Diversity and Human Rights
- LYPFT Hospitality, Sponsorship and Gifts
- LYPFT Health and Safety
- LYPFT Safeguarding
- LYPFT Whistleblowing/Freedom to Speak Up
- NOE CPC Supplier Code of Conduct

1.2. We demand that all suppliers to the NOE CPC to adhere to similar ethical principles. This policy supports our commitment to ensuring there is transparency in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

1.3. Human Trafficking and Modern Slavery guidance is embedded into the organisations policies. We adhere to employment checks and standards, which include right to work and suitable references. We are committed to social and environmental responsibility and have zero tolerance for Modern Slavery and Human Trafficking.

1.4. Any identified concerns regarding Modern Slavery and Human Trafficking would be escalated as part of the organisational *Safeguarding* processes, in conjunction with partner agencies where appropriate such as Local Authorities and Police.

1.5. Our commitment to Modern Slavery compliance is to:

- Comply with legislation and regulatory requirements in the undertaking of public procurement activity and follow best practice guidance where applicable to NHS organisations

- Ensure suppliers are aware that we promote the requirements of the legislation
- Consider modern slavery factors when making procurement decisions
- Use standard public sector pre-qualification documentation and NHS standard terms and conditions of contract for the purchase of goods and services wherever possible within our procurement processes
- Include modern slavery conditions or criteria in specification and tender documents wherever appropriate and relevant
- Expect framework providers to demonstrate compliance with their obligations in their processes.

1.6. To identify and mitigate the risks of modern slavery and human trafficking in our organisation we:

- Confirm the identities of all new employees and their right to work in the UK
- Ensure all employees have a contract of employment setting out the rights and obligations arising from their employment and their right to terminate their employment at any time
- Only use suppliers of human resources who have been accepted onto recognised frameworks where compliance with the Modern Slavery Act 2015 is a requirement, such as those produced by NHS Workforce Alliance to source labour
- Adhere to all relevant employment directives and legislation applicable in the UK, including minimum break periods, maximum working hours, entitlements to paid and unpaid leave, and pays all employees at least the minimum wage.

1.7. To identify and mitigate the risks of modern slavery and human trafficking in our supply chain we will:

- Procure services and products using the NHS Terms and Conditions (non-clinical procurement). These require suppliers to comply with relevant legislation, including the Modern Slavery Act 2015 and completion of the NQC Modern Slavery Questionnaire
- Purchase a significant number of products through recognised frameworks produced by NHS and/or public-sector organisations whose Supplier Code of Conduct includes a provision around forced labour
- Provide advice and guidance to suppliers requiring them to implement action plans to eliminate sub-standard practices
- Invoke sanctions against suppliers that fail to improve their performance or comply with terms and conditions. This may include the termination of contracts.

1.8. NOE CPC encourages all individuals to raise any concerns that they may have about the conduct of others in their business dealings on behalf of the NOE CPC or about the way in which the business is run using the procedures outlined in the organisation's *Whistleblowing* and *Anti-Fraud and Bribery* policies.

1.9. It is important to NOE CPC that any fraud, misconduct or wrongdoing by workers or officers of NOE CPC, which would threaten the integrity of the business. Including any circumstances that may give rise to an enhanced risk of slavery, or human trafficking is reported and properly dealt with.

1.10. We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we require that our suppliers hold their own suppliers to the same high standards.

- 1.11. This policy therefore applies to all persons working for us, or on our behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners

## 2. Responsibility for the Policy

- 2.1. The Managing Director of NOE CPC has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. This statement will be reviewed and amended accordingly on an annual basis.
- 2.2. The Senior Management Team at NOE CPC has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy.
- 2.4. All stakeholders are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Leigh Pratt on [leigh.pratt@supplychain.nhs.uk](mailto:leigh.pratt@supplychain.nhs.uk).

## 3. Compliance with the Policy

- 3.1. The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control.
- 3.2. Employees are therefore asked to:
- Avoid any activity that might lead to, or suggest, a breach of this policy
  - Notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or is likely to occur in the foreseeable future
  - Raise any concerns about issues or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager
  - Complete the organised modern day slavery online awareness training, and refresh every two (2) years.
- 3.3. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

#### 4. Breaches of the Policy

- 4.1. Any employee who breaches this policy, including failing to notify an appropriate person about criminal actions of which you are aware, may lead to disciplinary action potentially resulting in dismissal for misconduct or gross misconduct.
- 4.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.
- 4.3. Please note this policy does not form part of any employee's contract of employment and we may amend it at any time.

**Please note:** This statement is made pursuant to the Modern Slavery Act 2015 and relates to the activities undertaken by NOE CPC only, recognising that NOE CPC (and its host organisation Leeds and York Partnership NHS Foundation Trust) is an NHS organisation and as such may, or may not, be deemed to be a 'Commercial Organisation' under the definition contained within the Act.

Approved by:



**SIGNED:**

Name: Keith Rowley

Title: Managing Director  
North of England Commercial Procurement Collaborative

Date: 18/05/2022