

Modern Slavery and Human Trafficking Statement

Introduction

The Modern Slavery Act 2015 ('the Act') introduced changes in UK law focused on increasing transparency in supply chains, to ensure commercial supply chains are free from modern slavery. This statement is made in alignment with section 54(1) of the Act and constitutes the Trust's slavery and human trafficking statement for the period 2021-2022.

In accordance with the Act, Kingston Hospital NHS Foundation Trust (KHFT) takes steps to ensure modern slavery is not taking place in any part of its own business or any of its supply chains. We are committed to social and environmental responsibility and have zero tolerance for modern slavery and human trafficking. Any identified concerns regarding modern slavery and human trafficking are escalated as part of the Trust's safeguarding process, working in conjunction with our partner agencies.

Trust Commitment to Prevent Slavery and Trafficking

The Trust is an authorised statutory body and a provider of health care services, which dictates that acute care, the executive team, contractors, and all employees fully support the government's objectives to eradicate modern slavery and human trafficking.

The Trust has a clear line of accountability for safeguarding. The Trust Accounting Officer has ultimate accountability for ensuring that safeguarding and promoting the welfare of children and adults is discharged effectively across the Trust. The Chief Nurse is the executive lead for safeguarding and has responsibility for providing leadership and gaining assurance in relation to safeguarding issues within the Trust. All Trust staff are required to complete children and adult safeguarding training.

Policies and due diligence in relation to slavery and human trafficking

Modern slavery is incorporated in the Trust's safeguarding policies. A national framework is in place to assist in formal identification of victims and help to coordinate the referral of victims to appropriate services. This is known as the national referral mechanism and staff are directed to the Home Office website for further information. The Trust works with multi-agency partners locally and London-wide to identify emerging risks and prepare our workforce to take action if they have concerns.

The Trust has systems to encourage the reporting of concerns and the protection of whistleblowers, and has a dedicated freedom to speak up guardian, non-executive director lead, and policy. The Trust reviews all safeguarding referrals via its incident reporting system and shares the data at its Quality Assurance Committee, a board-level committee, chaired by a non-executive director.

The Trust's recruitment and employment checks process ensures all employment checks are in line with national NHS employment checks standards. These include identification, right to work, qualification, registration, DBS, and reference checks. In addition, the Trust requires external agency engagements to be made via framework approval suppliers, who are audited centrally and required to confirm that all staff have been checked for their right

to work, identification, qualification and registration in line with NHS employment check standards commensurate with trust processes.

Working with suppliers

NHS Supply Chain has a supplier code of conduct which outlines main principles for suppliers' labour standards and worker welfare. All suppliers are expected to adhere to these principles, which address issues such as child labour, forced labour, wages, working hours and health and safety. The supplier code of conduct is a contractual requirement and has been part of all NHS Supply Chain framework agreements since 2009.

The procurement service will identify and prioritise high risk areas in the supply chain, utilising guidance and resources as available, especially the Chartered Institute of Purchasing and Supply. Where necessary, risk assessment are carried out. Our procurement approach follows the Crown Commercial Service standard. When procuring goods and services, the Trust applies NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with relevant legislation.

Currently, all suppliers that provide the Trust with goods and services sign up to our terms and conditions of contract, which contain a provision around Good Industry Practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains. The provision around Good Industry Practice also ensures that the suppliers conduct their businesses in a manner that is consistent with the Trust's stance on anti-slavery.

In addition, an increasing number of suppliers are implementing the Labour Standards Assurance System (LSAS) as a condition of contract for tenders within high-risk sectors, and product categories as referenced in the Government's Modern Slavery Strategy. Many aspects of the LSAS align to the seven reporting areas that the Government has outlined, and should appear within any slavery and human trafficking statement.

Kingston Hospital NHS Foundation Trust remains committed to ensuring that modern slavery is not taking place in any part of its own business or any of its supply chains.

25 May 2022