

Modern Slavery and Human Trafficking Act 2015 Annual Statement

July 2024 to June 2025

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to Guy's and St Thomas' NHS Foundation Trust.

Organisational structure and purpose

Our Trust is made up of 5 of the UK's best-known hospitals – Guy's, St Thomas', Evelina London Children's Hospital and Royal Brompton and Harefield Hospitals. The Trust employs over 22,000 staff and has an annual turnover of over £2.6 billion.

The Trust provides a full range of hospital and community services for our local communities in Lambeth and Southwark. Royal Brompton and Harefield hospitals provide specialist heart and lung services across the country. The Trust also provides specialist services for patients from further afield, including cancer, cardiovascular, women's and children's services, kidney care and orthopaedics as well as having one of the busiest emergency department (A&E) in London.

Organisational policies

The Trust has internal policies and procedures in place that assess, identify and respond to any concerns in relation to the potential for modern slavery or human trafficking. The Trust Safeguarding procedure document includes information on modern day slavery/human trafficking with clear guidelines on how to identify, ensure patient safety and escalate using the agreed processes. The procedures states that staff should report incidents of all types and this includes concerns regarding modern slavery and human trafficking via the safeguarding route. Modern Slavery training is offered to A&E staff via their local training days. The training is also available to all staff as and when requested.

All staff have access to the trust Safeguarding Adults Service for support and guidance when they are concerned about modern day slavery or human trafficking. The Trust has a 'Freedom to Speak Up – Raising a matter of concern' policy which details how staff can raise any concerns that they may have confidentially. This can be through a Freedom to Speak Up email inbox, or through a conversation with the Freedom to Speak Up Guardian, who will provide support to the individual raising a concern. Staff are provided with this information at corporate induction.

Current initiatives

The Trust fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role the NHS has to play in both combatting it and supporting victims. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses. Steps taken to date include:

1) Procurement

Our Trusts procurement policy regarding modern slavery is based on the below key principles:

- **zero tolerance:** we maintain zero tolerance towards modern slavery, refusing any engagement with suppliers involved in forced labour or exploitation.
- **legislative compliance:** we adhere to all modern slavery laws, including the UK Modern Slavery Act, and enforce ethical conduct throughout our procurement processes
- **supplier engagement:** we communicate our ethical expectations to suppliers, requiring compliance with our modern slavery policy through codes of conduct and contractual obligations
- **risk assessment:** we assess and mitigate modern slavery risks in our supply chain, considering factors like location, industry sector, and procurement activities.
- **training and awareness:** we educate staff on identifying signs of modern slavery and the importance of ethical sourcing, ensuring a vigilant approach to procurement practices
- **reporting and investigation:** we establish clear reporting channels for suspicions of modern slavery, promptly investigating all concerns and taking appropriate action
- **continuous improvement:** we continuously review and enhance our policies and practices to strengthen our anti-slavery efforts and maintain alignment with best practices

Our procurement approach follows the Cabinet Office Procurement Policy Note 02/23: 'Tackling Modern Slavery in Government Supply Chains' to identify and manage risks in both new procurement activity and existing contracts:

- pre-procurement and specification: identify the risk of modern slavery to the contract to establish if modern slavery can be factored into the specification, ensuring that the approach taken is proportionate based on the risks identified
- selection stage: consider the mandatory and discretionary exclusion grounds as set out in the Standard Selection Questionnaire, and if these can be supplemented with additional questions for medium / high risk contracts, whilst not creating barriers to participation by SMEs/VCSEs
- award stage: apply the standard criteria in the Social Value Model, ensuring these sufficiently take account of the risk of modern slavery and any specification requirements, whilst taking a proportionate approach
- contract conditions: apply NHS Standard Terms and Conditions which require suppliers to comply with relevant legislation
- contract management: following contract award, continually work in collaboration with suppliers to monitor and address modern slavery risks, including a clear process for reporting and responding to suspected incidents of modern slavery. The safeguarding teams for children and adults oversee all new contract agreements to ensure that the safeguarding requirements as per the NHS Standard Contract are met

2) Supply chain

- We conduct thorough risk assessments to identify vulnerabilities to modern slavery within our supply chain. This assessment will consider factors such as geographical location, industry sector, and the nature of labour-intensive processes. Engaging with suppliers and continuously conducting on-site visits will be integral to understanding potential risks and implementing mitigation strategies.
- We establish clear expectations regarding labour standards and human rights through supplier codes of conduct and contractual agreements. We are working towards implementing robust due diligence processes to evaluate suppliers' compliance with these standards, including regular audits and third-party certifications. Suppliers found to be non-compliant will be given the opportunity to remediate, with termination of contracts as a potential resolution.
- We implement robust monitoring systems to track supplier performance and detect deviations from agreed-upon standards. This may involve the use of technology, such as supply chain mapping tools, to trace the origin of materials and monitor labour conditions in real-time. Non-compliance will be addressed through a range of enforcement measures, including contract termination and legal action if necessary.
- We actively participate in multi-stakeholder initiatives and industry collaborations aimed at eradicating forced labour and exploitation from supply chains. By sharing best practices, supporting regulatory reforms and community initiatives, we will contribute to a broader movement towards ethical sourcing and responsible business practices in the healthcare sector.

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

- the Trust adheres to the National NHS Employment Checks / Standards (this includes employees UK address, right to work in the UK and suitable references)
- the Trust has systems to encourage the reporting of concerns and the protection of whistleblowers
- other contracts are governed by standard NHS Terms and Conditions in which suppliers warrant that there is no slavery or human trafficking in its supply chains and they must notify the Trust if they become aware of any actual or suspected incidents of slavery or human trafficking in its supply chains
- the Trust request all suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through agreement of our 'Supplier Code of Conduct', purchase orders and tender specifications. All of which will set out our commitment to confirming there is no modern slavery or human trafficking related to Trust service provision
- the Trust upholds professional codes of conduct and practice relating to procurement with the procurement sourcing staff required to be members of the Chartered Institute of Purchasing and Supply (CIPS) and MCIPS qualified

3) Staffing clinical and non-clinical

- We continue to support all Trust staff to have knowledge commensurate with their roles in relation to modern slavery and human trafficking. Human trafficking and modern slavery are safeguarding related topics and staff awareness is raised when

receiving safeguarding training together with access to additional resources being available on the modern slavery web page.

- All clinical staff receive Safeguarding Adult level 2 training and will therefore have awareness of modern slavery and how to raise a safeguarding referral if they had concerns. Modern slavery and human trafficking is a crime and every individual working in the NHS has a role in keeping present and potential future victims of modern slavery and human trafficking safe.
- We ensure that all Trust staff have access to safeguarding training so that vulnerable victims are responded to appropriately.
- We ensure the safeguarding procedures document includes up to date information on modern slavery and human trafficking.
- We identify which contracts are at high or medium risk of modern slavery based on industry type, complexity of supply chain, the nature of the workforce, context in which the supplier operates, type of commodity and supplier location. Work with the suppliers on high and medium risk contracts to mitigate the risks through contract management.
- Bank workers are recruited under the same requirements as substantive employees following safer recruitment processes. Agency staff, are only recruited from agencies that are on approved NHSEI frameworks.

Effective action taken to address modern slavery – performance indicators

The Trust is committed to the protection of vulnerable people and has zero tolerance for modern slavery and human trafficking. Any identified concerns regarding modern slavery and human trafficking are escalated as part of the organisational safeguarding process. All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the procurement department taking responsibility for overall compliance.

Key Performance Indicators in order to support the Trust's tolerance to address modern slavery:

- **supplier compliance rate** – this reflects the effectiveness of the hospital's efforts in ensuring ethical sourcing practices and combating modern slavery. A 100% compliance rate indicates a stronger commitment to human rights and labour standards throughout the supply chain
- **staff training and awareness** –this ensures our staff demonstrate an understanding of modern slavery risks, reporting procedures, and ethical sourcing practices following training sessions. All Trust staff have access to safeguarding training commensurate with their roles so that vulnerable victims are responded to appropriately. Training compliance is set at 85% as is the local ICB agreement

The Trust reviews its Modern Slavery and Human Trafficking Statement on an annual basis and presents it at the Board of Directors.