

Modern Slavery and Human Trafficking Statement 2023/24

Overview

Modern slavery is the removal of personal freedoms in order to exploit human beings for financial or personal gain. It can take many forms including forced labour, human trafficking and sexual exploitation. It is a complex issue with a global reach. There were an estimated 50 million people in modern slavery in 2021¹ and these numbers are increasing. We recognise that modern slavery will exist in our supply chain, and we are committed to do all we can to identify and mitigate the risks within our business, recruitment, and purchasing activities.

The Modern Slavery Act 2015 introduced changes into UK law to increase transparency in supply chains, including the requirement for large commercial organisations to prepare an annual slavery and human trafficking statement. To fulfil this requirement and to ensure that our supply chain, recruitment and people practices are free from exploitation, we have prepared and published this statement. We aim to be open and transparent about the work we are doing but also about the areas where we can do more. This statement provides a foundation upon which we can continually improve.

Our Statement

This Modern Slavery and Human Trafficking Statement is for the financial year ending 31 March 2024. It outlines the shared commitment and actions that have been carried out by Bristol and Weston NHS Purchasing Consortium (B&WPC), North Bristol NHS Trust (NBT) and University Hospitals Bristol and Weston NHS Foundation Trust (UHBW) over this time period. In the statement, terms such as 'our' and 'we' refer to all three organisations.

This is the first modern slavery statement that we have produced. It covers the following areas of our business activities:

1. The procurement of goods and services
2. The recruitment of both temporary and permanent employees
3. The working conditions and practices for our employees.

Organisation Structure and Supply Chains

Bristol and Weston Purchasing Consortium

B&WPC provides a comprehensive range of purchasing services to support local Trust and Healthcare providers.

B&WPC staff are NHS employees hosted by North Bristol NHS Trust and the services provided include all aspects of clinical and non-clinical purchasing and supply chain management. B&WPC's

main clients include both NBT and UHBW and account for an annual spend of approximately £750m. B&WPC's annual commercial turnover is [amount]. B&WPC works closely with both Trusts to support compliance with all purchase-to-pay procedures and deliver improved efficiencies.

North Bristol NHS Trust

NBT has over 12,000 staff delivering healthcare across main sites at Southmead Hospital Bristol, Cossham Hospital and Bristol Centre for Enablement and within the local community of Bristol, North Somerset and South Gloucestershire. NBT is a regional centre for neurosciences, plastics, burns, orthopaedics and renal services. NBT's aim is to deliver an outstanding patient experience and its values of caring, ambitious, respectful and supportive underpin everything that it does. NBT's annual commercial turnover is [amount].

University Hospitals Bristol and Weston NHS Foundation Trust

UHBW has a workforce of over 13,000 staff, delivering over 100 different clinical services across 10 sites in Bristol and Weston-super-Mare and serving a core population of more than 500,000 people locally and from across the southwest. UHBW provides specialist regional maternity, neonatal, children's, cardiac and cancer services, among others. UHBW's values (supportive, respectful, innovative and collaborative) have been developed with staff; they drive its behaviour and shape its identity and culture as a Trust to provide the best possible environment for patients and staff. UHBW's annual commercial turnover is [amount].

Supply Chains

Our supply chains are large, multi-tiered, global and complex. We procure a wide range of clinical and non-clinical goods, services and works. These include medical equipment, personal protective equipment and uniforms, dressings, mattresses and bed linen, laptops, software, furniture and mechanical and electrical services to name but a few.

Many of our purchases are from sectors that are known to be high risk for modern slavery. Our approach to identifying and managing modern slavery risks must be embedded into any new procurement activity and within our existing contracts to be effective.

Our contractual relationships vary from medium-to-long-term arrangements to one-off purchases. As part of our procurement policy, we actively seek to utilise frameworks provided by public sector organisations such as NHS Supply Chain and Crown Commercial Services. We have over 2,500 tier 1 suppliers and over 1,000 active contracts in place.

Recruitment and People

NBT and UHBW recruit nursing and clinical staff from overseas. Although all applicants can apply for posts via the Trusts' websites, where particular staff shortages have been identified the Trusts also undertake international recruitment campaigns using overseas recruitment agencies to identify suitable candidates for interview.

Policies in relation to slavery and human trafficking

We are committed to eradicating modern slavery and human trafficking within our supply chain and our recruitment and people practices.

Procurement and Supply Chains

We include net zero and social value criteria in the evaluation of all tenders, in accordance with PPN 06/20 (“Taking account of social value in the award of central government contracts”)². We follow the recommendations in PPN 02/23 (“Tackling Modern Slavery in Government Supply Chains”)³ and have created two policies that build on the national-level focus to address modern slavery and human trafficking. The B&WPC Procurement Strategy 2022-25 is published online and is publicly available, having been signed off and approved by the Trust Boards of both NBT and UHBW.

1. B&WPC Procurement Strategy 2022-25

This document sets out our values and outlines the areas of focus for B&WPC to ensure that we are maximising the value obtained from our external spend. There are 4 objectives within the strategy. The Anchor in the Community objective includes a clear commitment to remove modern slavery from our supply chain and to use our market leverage to drive an ethical supply chain. The aim is to ensure that our supply chains and procurement processes are ethical, free from worker abuse and exploitation, and provide safe working conditions. An away day was held with all B&WPC staff to engage with and explore the strategy and what its aims mean to the team in the short, medium and long terms.

2. Joint Ethical Procurement Strategy

This document will reflect our joint vision and aims to support the delivery of exceptional healthcare services in a sustainable manner. Included within the definition of ‘sustainable’ is ethical conduct and social value. We will document a specific commitment to ensure that our supply chain and procurement processes are ethical, free from worker abuse and exploitation, and provide safe working conditions. This policy will be approved and be available publicly before the end of this financial year.

Recruitment and People

Our existing recruitment policies comprise [NBT and BWPC recruitment/HR policy]. All UHBW recruitment and people policies are now included in the Respecting Everyone Policy, which came into force on 13 November 2023. These policies include recruitment processes for temporary and permanent employees, and our duties to staff once employed. Policies last for three years before major review, although we may review them on an ad hoc basis in response to changes in good employment practice or legislation. The overall approach is governed by compliance with legislative and regulatory requirements, maintaining and developing good employment practice including fair treatment, and promoting a caring, patient- and people-centred environment.

Our recruitment processes are robust and adhere to safe recruitment principles. We have a range of policies and procedures to protect staff from poor treatment and/or exploitation which comply with all legislative and regulatory requirements. This includes policies on recruitment, pay, and equality, diversity and inclusion.

In addition to this, we have clear systems and policies in place to encourage reporting of concerns about poor and inappropriate practices, speaking up and protection of whistleblowers. At NBT, these include the Safeguarding Adults and Children, Dignity at Work, and Freedom to Speak Up Policies and the Grievance Procedure; at UHBW, they include the Safeguarding Adults, Children, Young People and the Unborn Baby Policy, the Freedom to Speak Up Policy and Procedure, and the Respecting Everyone Policy. We have dedicated Freedom to Speak Up Guardians and executive and non-executive director leads for Freedom to Speak Up through whom concerns about modern slavery and human trafficking can be raised.

Risk Assessment and Management

A category-level environmental, social and governance risk assessment has been carried out for our spend profile. This assessment identified modern slavery risks including the risks of forced labour, child labour, poor working conditions and discrimination within the supply chain.

The following purchasing categories were identified as high risk:

- Construction
- Information Technology (IT)
- Food and Catering
- Medical Equipment
- Textiles (clothing, bed linen etc)
- Waste Management
- Temporary Staff and Recruitment Services.

We are aware of the high risk attaching to cotton-containing products, surgical instruments and surgical gloves procured via the NHS supply chain, as set out in the DHSC policy paper “Review of risk of modern slavery and human trafficking in the NHS supply chain”⁴ and will review our procurement policies and procedures in the light of any legislative changes implemented as a result of this paper. In the meantime, the B&WPC Procurement Strategy 2022-25 and Joint Ethical Procurement Strategy contain measures to identify and mitigate the risk of modern slavery in our supply chain, as explained above.

Due Diligence Processes

Procurement and supply chains

Our standard checks within our procurement process, include checking bidders (where relevant) for their compliance with the Modern Slavery Act (2015).

We have been engaging with our category leads and main suppliers within our IT category to raise awareness and understand the maturity levels of work across the sector in this area. We aim to replicate this approach for other high-risk categories. We will use this to inform the due diligence processes we need to implement.

We recognise that our current due diligence processes are not adjusted to reflect the risk associated with the purchase involved. We will develop our process over the coming year to ensure that our due diligence processes are proportionate to the risk posed by the purchase in question.

Recruitment and People

Our robust recruitment processes are in line with relevant employment legislation and adhere to safe recruitment principles. We follow strict pre-employment checks on all directly employed staff, bank workers and others undertaking work within our organisation. These include identification, right to work, qualification, registration and reference checks. Our pre-employment checks are in line with the NHS employment check standards and our resourcing functions oversee fair and equitable recruitment and selection practices.

We align to nationally negotiated NHS pay rates and terms and conditions of employment. We consult and negotiate with recognised Trade Unions on proposed changes to working arrangements, policies and contractual terms and conditions.

Only approved frameworks are used for the recruitment of temporary agency staff. All providers are audited to provide assurance that pre-employment clearance has been obtained in line with the NHS Employment Check Standards.

We also provide access to learning and development opportunities and provide a comprehensive staff benefits and health and wellbeing offer.

Key Performance Indicators to Measure Effectiveness

We have a robust governance mechanism for monitoring the delivery of the commitments set out in our policies. The Sustainable Procurement Workstream, which is part of the ICS Green Plan Implementation Group, is made up of representatives from all three organisations. It is responsible for driving the delivery of the commitments and reporting on their progress to the Green Plan Steering Group that sits above this and feeds into Executive and Board-level activities at each organisation.

Training on Modern Slavery and Human Trafficking

We provide advice, training and support about modern slavery and human trafficking to all staff through our safeguarding children and adults mandatory training, our safeguarding policies and procedures and our safeguarding teams.

We also ensure that all staff working in B&WPC and staff from NBT and UHBW who procure goods and services directly from suppliers receive a comprehensive induction programme which includes information and guidance on modern slavery and human trafficking. B&WPC has developed a capability framework for all procurement job roles, which includes modern slavery and social value. A list of available training resources, including those on modern slavery, has been compiled and is available for B&WPC staff to access.

UHBW and NBT plan to develop education resources and make them available to their staff and, over the coming year, identify key stakeholders who are involved in the procurement and contract management process to focus engagement efforts and further drive our shared commitment to eradicate modern slavery and human trafficking from our supply chains.

Signed by



Jayne Mee
Chair

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3. Government Commercial Function and Civil Service. Procurement Policy Note 02/23. "Tackling Modern Slavery in Government Supply Chains. A guide for Commercial & Procurement Professionals".
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