

Modern Slavery and Human Trafficking Statement 2023/24

Introduction

Milton Keynes University Hospital (MKUH) NHS Foundation Trust is committed to preventing acts of modern slavery or human trafficking from occurring in any part of its business operations and supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes MKUH NHS Foundation Trust’s modern slavery and human trafficking statement for the financial year commencing 1 April 2023 and ending 31 March 2024. It aims to demonstrate that the Trust follows best practice and that all reasonable steps are taken to prevent slavery and human trafficking.

This statement has been approved by the Trust’s Board of Directors, which together with the Audit Committee, will review and update it as necessary on an annual basis.

Structure and business of the organisation (summary)

Milton Keynes Hospital NHS Foundation Trust was founded on 1 October 2007 under the National Health Service Act 2006. The hospital has around 559 beds, including day acute and neonatal beds and employs around 4,152 staff, providing a full range of acute hospital services and an increasing number of specialist services to the growing population of Milton Keynes and surrounding areas. All in-patient services and most outpatient services are provided on the main hospital site. The Trust is organised into four clinical divisions (medicine, surgery, women and children and core clinical) and a number of corporate directorates. The executive directors, and clinical service unit (CSU) leadership teams, are responsible for the day-to-day management and running of the hospital's services, with ultimate management accountability resting with the Chief Executive.

Policies and procedures relating to modern slavery

All members of staff have a corporate responsibility for the prevention of slavery and human trafficking and human rights abuses.

The Trust has policies and procedures in place designed to provide guidance and advice to staff in assessing and managing risks in relation to modern slavery and human trafficking.

These policies additionally give a platform for staff to raise concerns about poor working practices.

Key policies and procedures include:

1. Safeguarding

The Trust’s commitment to contribute to the eradication of modern slavery is reflected in the Safeguarding Adults and Safeguarding Children policies, which have been developed in accordance with safeguarding legislation

(including the Care Act 2014 and The Children Act 1989) and national guidance. All staff can contact the Safeguarding Team for support and advice if they have a concern and the Trust's safeguarding intranet pages include information, guidance and the Modern Slavery Helpline.

To identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain the Trust provides mandatory safeguarding training for all staff and includes information on modern-day slavery and human trafficking in order to promote the knowledge and understanding of escalating concerns internally and externally via the Home Office national referral mechanism.

2. Freedom to speak up

The Trust promotes a culture of openness and accountability by encouraging reporting of concerns, including any circumstances that may give rise to risk of slavery or human trafficking.

The Trust's Freedom to Speak Up Policy offers guidance to staff on raising concerns confidentially and provides reassurance as to how the Trust will respond to them. Freedom to Speak up Guardians and Champions are available to provide immediate support and signposting for staff members raising concerns.

To identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain the Trust has systems to encourage the reporting of concerns and the protection of whistleblowers; provides all new staff with information on the Freedom to Speak Up Policy through corporate induction and the intranet provides further guidance and contact details for the Trust's Freedom to Speak Up Guardians and Champions.

In addition, staff have duties imposed upon them to raise such concerns by their respective professional regulatory bodies, such as the GMC, NMC, etc.

3. Recruitment and selection practices

Overseen by the Trust's Human Resources Department, the Trust has recruitment processes in place to ensure that staff are appointed subject to references, pre-employment checks (including immigration checks and identity checks). This ensures that we can be confident, before staff start their employment that they have a legal right to work within the Trust.

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); follows NHS Agenda for Change terms and conditions to ensure that staff receive fair pay rates and contractual terms; agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff.

International recruitment is managed through NHS Professionals who manage the pre-employment check process.

4. Equality, diversity and inclusion and human rights

The Trust has a range of controls in place to protect staff from discrimination, poor and unfair treatment and/or exploitation. These comply with all respective laws and regulations, including the Equality Act 2010 and Human Rights Act 1998.

The Trust is committed to ensuring equality of access to employment and training opportunities for staff and access to personalised care that meets individual needs for our patients. We will eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations in all that we do.

All Trust activities and policies are required to have an Equality Impact Analysis (EIA) completed.

To identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain the Trust has a range of controls in place to protect staff from poor treatment and / or exploitation, which comply with relevant laws and regulations; undertakes consultation and negotiation with Trade Unions on proposed changes to employment, work organisation and contractual relations; promotes and provides support for the right for staff to raise concerns, for example about poor working practices.

5. Procurement

The Trust acknowledges that ethical standards are a core principle for procurement. Through its purchasing policies and by upholding professional practice the Trust sources goods and services in a manner that aims to ensure the wellbeing and protection of workforces across our supply chain.

Through a combination of purchasing through NHS Supply Chain and using NHS standard terms and conditions that include the requirement for suppliers to have modern slavery and human trafficking policies and processes in place, the Trust minimises the risk of social exploitation; ensuring that people are treated with respect and their rights are protected.

To identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain the Trust ensures the majority of our purchases utilise existing supply contracts or frameworks which have been negotiated by NHS Supply Chain or under the NHS standard terms and conditions of contract, which all have the requirement for suppliers to have modern slavery and human trafficking policies and processes in place; upholds professional practices relating to procurement and supply and ensures procurement staff attend regular training on changes to procurement legislation; requests all suppliers to comply with the provisions of the Modern

Slavery Act (2015), through agreement of purchase orders and tender specifications.

The Trust's Commitments

The Trust supports and respects the protection of human rights for all its employees and workers within its supply chain. We believe in treating individuals with respect and dignity, and do not condone the use of our products or services which infringe the basic human rights of others.

We expect our suppliers and business partners to adhere to the same high standards and to take all reasonable steps to combat slavery and human trafficking. The Trust has in place due diligence procurement and tendering processes to ensure all its selected suppliers and any third parties are compliant with the Model Slavery Act (2015).

Accordingly, we are committed to ensure that:

- We are not complicit in human rights abuses of any kind and that slavery or human trafficking are not taking place in our supply chain or any part of the Trust's business; this includes our subsidiary ADMK Ltd
- Employment with the Trust and our suppliers is voluntary
- Our workplace and those of our suppliers are free from discrimination or harassment based on race, colour, religion, gender (including pregnancy), sexual orientation, marital status, gender identity, national origin, age, disability, or any other characteristic protected by applicable law
- Our workplaces are safe and healthy
- Corruption in all its forms, including extortion and bribery, is prohibited
- Our policies and procedures are devised to reflect we take all reasonable steps to achieve these commitments. This includes, but is not limited to, the following policies: Procurement; Counter Fraud; Employment; Conflicts of Interest (including Sponsorship, Gifts and Hospitality); Safeguarding of Adults at Risk of Abuse.

The Trust's Board of Directors has approved this statement and will continue to support the requirements of the legislation.

Approved by the Board of Directors on **06 July 2023**