



## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

Modern Day Slavery is a violation of a person's human rights and is a global issue and concern for public services. It can take the form of human trafficking, forced labour, bonded labour, forced or servile marriage, descent-based slavery, and domestic slavery.

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. The Health and Care Act 2022 introduced new provisions on modern slavery within the NHS to ensure that the NHS is not buying or using goods or services produced by or involving any kind of slave labour.

This statement is made in line with section 54(1) of the Act and sets out the steps that Calderdale and Huddersfield NHS Foundation Trust (CHFT) and its subsidiary Calderdale and Huddersfield Solutions Limited take to prevent modern slavery and human trafficking in our business or supply chain for the year ending 31 March 2025.

### **Trust Commitment to Prevent Slavery and Trafficking**

The Trust, as an authorised statutory body and a provider of health care services, recognises the significant role the NHS must play in both combatting Modern Slavery and supporting victims. Our acute care team, the Executive team, contractors, and all employees fully support the Government's objectives to eradicate modern slavery and human trafficking.

### **Our Trust and Supply Chains**

In accordance with the Act, CHFT 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.

All staff at the Trust, in clinical and non-clinical roles, have a personal responsibility to consider issues regarding modern slavery and human trafficking and incorporate their understanding of these issues into their day-to-day practice. The three main areas relate to:

- Our workforce through recruitment
- Our patients presenting for treatment (safeguarding)
- Our supply chain through procurement.

## **Arrangements for Preventing Modern Slavery and Human Trafficking, including Policies, training and due diligence**

### ***Our Patients***

Modern slavery is incorporated in the Trust's safeguarding policies which are linked to West Yorkshire multi-agency policies.

There is a clear line of accountability for safeguarding, with any identified concerns regarding modern slavery and human trafficking escalated as part of the Trust's safeguarding process, working in conjunction with our partner agencies.

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. We provide safeguarding training for our workforce, with all Trust staff being required to complete children and adult safeguarding training, with higher levels of safeguarding training provided appropriate to roles.

The Trust uses a national framework to assist in formal identification of victims of modern slavery 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 multiagency partners locally to identify emerging risks and prepare our workforce to act if they have concerns.

The Trust reviews all safeguarding referrals via its incident reporting system and shares the data at its Safeguarding Committee which reports to the Quality Committee, a Board level Committee, chaired by a Non-Executive Director.

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.

### ***Our Workforce***

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, Disclosure and Barring Service, 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.

As part of ongoing professional development and delivery, it is encouraged that procurement staff are encouraged required to undertake the CIPS Ethical Procurement and Supply training and Social Value Mandatory eLearning via Government Commercial Function. This helps our teams to do the following when carrying our commercial activity:

- identify modern slavery risks;
- manage risks effectively in supply chains and existing contracts; and
- act when victims of modern slavery are identified.

### ***Our Supply Chain***

The Trust's procurement is managed by Calderdale and Huddersfield Solutions Ltd (CHS), a wholly owned subsidiary of the Trust. Working with suppliers, CHS Ltd provides procurement, contracting and supply chain services to the Trust.

As a key principle of all procurement activity, steps are taken to identify, prevent and mitigate modern slavery in its contractual service provision and supply chains. Consideration is made for compliance with Procurement Policy Note 05/19: 'Tackling Modern Slavery in Government Supply Chains' (and as updated in 02/23).

As part of ongoing professional development and delivery, procurement staff are required to undertake the CIPS Ethical Procurement and Supply training and Social Value Mandatory eLearning via Government Commercial Function.

Policies and procedures are in place that assess supplier risk in relation to the potential for modern slavery or human trafficking when making procurement decisions.

Included within our procurement process is a mandatory exclusion question regarding compliance with Section 54 of the Modern Slavery Act 2015. We also apply appropriate and proportionate quality criteria to ensure true value is obtained, reducing the risk of price-focused competition. This may include detail of prospective suppliers' working practices, policies, and procedures. Where procurements are deemed to be high risk, enhanced activities will be undertaken at Selection Questionnaire stage, with suppliers being asked to provide specific self-declarations for each member of their supply chain.

The Trust(s) major supplier of clinical consumables, equipment and maintenance services is NHS Supply Chain (NHSSC) who operates with a Supplier Code of Conduct which outlines main principles for suppliers' labour standards and worker welfare. All suppliers to NHSSC 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. Through the adoption of the NHS Standard terms and conditions of supply of goods and/or services the Partnership ensure standard contracts comply with all relevant legislation, including terms regarding Modern Slavery Act compliance principles. We also utilise various public sector framework agreements and these frameworks contain such provision. The contracts set out the behaviours expected throughout

procurement and supply chain relationships. We include performance indicators in supplier contracts so we can monitor progress against contractual commitments. These can include Social Value and training commitments, and obligations for suppliers to conduct supply chain analysis. Calderdale and Huddersfield Foundation Trust and Calderdale and Huddersfield Solutions Ltd remains committed to ensuring that modern slavery is not taking place in any part of its own business or any of its supply chains.

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

Signed on behalf of the Board of Directors by

A handwritten signature in black ink, appearing to read "Brendan Brown". The signature is written in a cursive style with a large initial 'B' and 'B'.

Brendan Brown  
Chief Executive