

Cover Sheet

Trust Board Meeting in Public: Wednesday 15 January 2025

TB2025.07

Title: OUH Modern Slavery Statement

Status: For Decision

History:

Board Lead: Chief Nursing Officer

Presenter: Tracy Toohey, Head of Safeguarding

Confidential: No

Key Purpose: Assurance, Performance.

OUH Modern Slavery Statement

1. Purpose

- 1.1. Concisely Under Section 54 (1) of the [Modern Slavery Act 2015](#), the Trust Board of Directors are required to agree, approve, and sign the annual Modern Slavery statement.
- 1.2. The statement is required to be published on the Trust website.

2. Background

- 2.1. Provide Modern slavery is an umbrella term encompassing human trafficking, slaver, servitude and forced labour.
- 2.2. Under the All NHS Trust are required to publish an annual Modern Slavery statement if:
 - 2.2.1. It is a 'body corporate' or a partnership, whether incorporated or formed
 - 2.2.2. It carries on a business, or part of a business in the UK
 - 2.2.3. It supplies goods or services
 - 2.2.4. It has an annual turnover of £36 million or more
- 2.3. The Trust was required to provide this statement annually which was planned for previously which has not been submitted.
- 2.4. The ICB audited Trust in across the ICS and identified the OUH did not have a statement published and notified the Head of Safeguarding of this omission.

3. Legislation

- 3.1. All NHS bodies are required to provide an update and publish an annual statement as per Section 54 (1) of the Modern Slavery Act (2015) to include steps taken during the year to ensure that slavery and human trafficking is not taking place. [Publish an annual modern slavery statement - GOV.UK \(www.gov.uk\)](#)

- 3.2. The Trust is required to demonstrate that the OUH follows good practice, and all reasonable steps are taken to prevent slavery and human trafficking.

4. Conclusion

- 4.1. A statement has been produced following the guidance and reviewed by HR for Trust Board sign off.
- 4.2. Statement to be published on the intranet as per legislative requirement.

5. Recommendations

- 5.1. The Trust Board is asked to:
 - Approve the statement to be signed by the Chief Executive Officer and published on the OUH website.

6. Modern Slavery Act 2015 - Annual statement 2024/25

Modern Slavery Act 2015 Section 54

This statement is made pursuant to s54 of the Modern Slavery Act 2015 and sets out the steps that Oxford University Hospitals NHS Foundation Trust has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain during the year ending 31 March 2021.

As a Trust we are committed to ensuring that all of our employees are aware of the Modern Slavery Act 2015 and their safeguarding duty to protect and prevent any further harm and abuse when it is identified or suspected that the individual may be or is at risk of modern slavery/human trafficking. Oxford University Hospitals has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

The aim of this statement is to demonstrate that the Trust follows good practice, and reasonable steps are taken to prevent to understand potential modern slavery and human trafficking risks and to implement effective systems and controls.

Trust Structure and Principal Activities

OUH is one of the largest NHS teaching Trusts providing services for all aged people living in Oxfordshire and the surrounding areas as well as providing specialist services for wider areas.

The Trust is made up of four hospitals - the [John Radcliffe Hospital](#) (which includes the Children's Hospital, West Wing, Eye Hospital, Heart Centre and Women's Centre), the [Churchill Hospital](#) and the [Nuffield Orthopaedic Centre](#), all located in Oxford, and the [Horton General Hospital](#) in Banbury, north Oxfordshire. While most services are provided in our hospitals, over six percent are delivered from 44 other locations across the region, and some in patients' homes.

We are part of the Oxfordshire Place-base Partnership, which is comprised of, Oxford Health NHS Foundation Trust, South Central Ambulance Service NHS Foundation Trust. The Trust is also part of the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care System (ICS) and works closely with the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (ICB).

Our collaboration with the University of Oxford underpins the quality of the care that is provided to patients, from the delivery of high-quality research, bringing innovation from the laboratory bench to the bedside, to the delivery of high-quality education and training of doctors.

Existing collaborations include the ambitious research programmes established through the Oxford Biomedical Research Centre (BRC), funded by the National Institute for Health Research (NIHR), located on the John Radcliffe Hospital site and at the Biomedical Research Unit in musculoskeletal disease at the Nuffield Orthopaedic Centre. These set the standard in translating science and research into new and better NHS clinical care.

We work closely with a range of partners including commissioners, local councils, NHS England, the private sector and voluntary organisations to deliver innovative and integrated care to our communities.

We procure goods and services from a range of providers. Contracts vary from small one-off purchases to large service contracts. All spend, aside from a few exceptions such as rates, is paid via Purchase Order (PO). The Applicable Contract Terms Policy applies to any NHS organisation and states that where an NHS body issues a PO the standard Terms & Conditions apply. Our terms and conditions contain a provision around Good Industry Practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains; and that they conduct their businesses in a manner that is consistent with Oxford University Hospitals' anti-slavery policy.

Organisational policies in relation to slavery and human trafficking

The OUH has internal policies and procedures in place that assess supplier risk in relation to the potential for modern slavery or human trafficking. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships.

The Trust has a strong safeguarding governance structure for both adults and children and is committed to providing staff the necessary knowledge and skills about modern slavery and human trafficking. There is training provided, and compliance is reported monthly, this training covers all aspects of modern slavery including the identification of potential victims and the types of abuse and exploitation that can occur. The OUH Safeguarding Adult and Children Policy includes information on modern day slavery/human trafficking. Support is provided by the safeguarding team to staff who raise concerns about patients. The HR Designated Safeguarding Officer

All staff have access to the Safeguarding team for support and guidance when they are concerned about modern day slavery or trafficking.

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.

The Freedom to Speak Up Guardians support to staff or to teams who wish to raise a concern. The FTSU team also work to identify and breakdown barriers to Speaking Up and raise awareness of its importance to both staff and patient safety across the Trust. The role of the Freedom to Speak Up Guardian is covered at the Trust's monthly corporate induction; the Trust has adopted the National Freedom to Speak Up Policy in line with national guidance and the importance of speaking up is celebrated annually via October Speaking Up Month. The FTSU Service also provides the Trust Board with reports twice a year one of which is the Annual Report summarising all key activity.

Trust activities and policies are required to have an Equality Impact Assessment (EQIA) completed.

Our Commitment

The OUH is committed to ensuring all staff are aware of the Modern Slavery Act and their safeguarding duties to protect and prevent further harm and abuse when identified or suspected that a person may be at risk of modern slavery or human trafficking.

We are aware of the responsibilities and are committed to promoting a proactive and inclusive approach to equality in ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

The Trust Modern Slavery and Human Trafficking Statement will be reviewed annually and presented at the Board.

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 raising and reporting of concerns and the protection of those that do so.
- The Trust purchases a significant number of products through NHS Supply Chain, whose Supplier Code of Conduct includes a clause stating that 'the supplier shall make no use of forced or compulsory labour'. Where possible, all other contracts are governed by standard NHS Terms & Conditions which include significant requirements related to modern slavery as well as environmental, social and labour laws.
- The majority of our purchases use existing supply contracts or framework agreements which have been negotiated under the NHS Standard Terms and Conditions of Contract. The framework agreements are governed by NHS Standard Terms & Conditions.
- All suppliers are required by law to comply with the provisions of the UK Modern Slavery Act (2015). This will be reinforced where appropriate by Standard Selection Questionnaires as part of tender processes along with use of NHS Standard Terms and Conditions either direct with suppliers or through framework agreements. The most recent update to these contracts strengthens the position on Modern Slavery, including the option to terminate for breaches.
- Undertaking appropriate pre-employment checks on directly employed staff and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff
- Implementing a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair Terms of Conditions of employment and access to training and development opportunities
- Consulting and negotiating with Trade Unions on proposed changes to employment, work organisation and contractual relations
- We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will

Effective action taken to address modern slavery – Performance Indicators

The Trust is committed to social and environmental responsibility 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 internal governance and organisational safeguarding processes. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BHTs slavery and human trafficking statement for the current financial year.

All employees have a personal responsibility for the successful prevention of slavery and human trafficking with the procurement department taking responsibility for overall compliance.

A Freedom to Speak Up Report is submitted quarterly to the Trust Strategic People Committee and twice a year to the Trust Board. Any themes or trends are highlighted through these reporting mechanisms but should something be of concern such as trafficking or modern slavery these would be raised immediately either by exception reporting or direct to an executive director as appropriate.

No reports have been received from our staff, the public, or law enforcement agencies to indicate that any modern slavery practices have been identified.

Training on modern slavery and trafficking

Advice and training about modern slavery and human trafficking is available to staff through our mandatory safeguarding children and adults training programmes, our safeguarding policies and procedures, and our safeguarding leads. It is also discussed at our compulsory staff induction training.

We are looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

Conclusion

This statement has been presented to the Board of Directors on DATE, Approved by Board on DATE

Signature:

Meghana Pandit, Chief Executive Officer – on behalf of the Board

Date:

Next review: Dec 2025