**MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2021/2022**

**Slavery and Human Trafficking Policy Statement**

**1. Introduction**

Modern Slavery remains a hidden blight on society. We all have a responsibility to be alert to the risks, however small, in our organisation and in the wider supply chain. Our colleagues are expected to report concerns and our management teams are expected to act upon them.

At Oxford Health NHS Foundation Trust (**OHFT**) we are committed to ensuring that no modern slavery or human trafficking takes place in any part of our business or our supply chain upholding the provisions of the Modern Slavery and Human Trafficking Act 2015. This statement sets out actions taken by OHFT to understand all potential modern slavery and human trafficking risks and to implement effective systems, controls and best practice in order take all reasonable steps to prevent slavery and human trafficking. We expect our staff and suppliers to comply with the legislation and report any concerns where they may have them.

OHFT wishes its service users, staff and all stakeholders to be confident in the knowledge that we operate a zero-tolerance approach to modern slavery and human trafficking, and we are working as best we can to ensure that such practise does not exist anywhere in our Trust or in our supply chain.

**2. Our Commitment**

We are fully aware of the responsibilities we bear towards our service users, staff and local communities. We aim to follow good practice and to take all reasonable steps to prevent slavery and human trafficking.

We are committed to promoting a proactive and inclusive approach to equality in both employment and service provision which supports and encourages an inclusive culture which values diversity; this includes a commitment to building a workforce which is valued and whose diversity reflects the communities it serves, enabling the Trust to deliver the best possible healthcare services.

We are guided by a strict set of ethical values in all of our business dealings and expect our suppliers to adhere to these same principles. We are committed to ensuring there is no modern slavery in any part of our business and, in so far as possible, require our suppliers to hold the same ethos.

We are also committed to ensuring that all our staff 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 an individual may be or is at risk of modern slavery and human trafficking.

**3. Organisational Structure**

OHFT provides physical, mental health, learning disability and social care for people of all ages across Oxfordshire, Buckinghamshire, Swindon, Wiltshire, Bath and North East Somerset. Our services are delivered at community bases, hospitals, clinics and people’s homes. We focus on delivering care as close to home as possible.

As a leading teaching, training and research trust, we have close links to Oxford and Oxford Brookes, Buckinghamshire/Bedfordshire, Reading and Bath universities. We are part of the Oxford Academic Health Science Centre, working closely with our university colleagues to translate their findings into clinical care as quickly as possible, enabling people using our services to benefit from the latest advances in healthcare. We host the NIHR Oxford Health Biomedical Research Centre with Oxford University, and aim to bring the best science to the complex problems of mental disorders and dementia. We also host the NIHR Applied Research Collaboration Oxford and Thames Valley (NIHR ARC OTV) a partnership between universities, healthcare organisations, charities and industry targeting health and social care problems in Oxfordshire and the Thames Valley.

Further information about OHFT can be found on the following website: <http://www.oxfordhealth.nhs.uk/>

Our supply chains enable the procurement of a wide range of goods and services on behalf of our clients and service users.

**4. Our Policy on Slavery and Human Trafficking**

We are fully aware of the responsibilities we bear towards our service users, employees and local communities. We are guided by a strict set of ethical values in all our business dealings and expect our suppliers (i.e. all companies we do business with) to adhere to these same principles. We have zero tolerance for slavery and human trafficking. Staff are expected to report concerns about slavery and human trafficking and management are expected to act upon them in accordance with our policies and procedures.

**5. Due Diligence, Risk Assessment and Management**

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

* Undertake appropriate pre‐employment checks on directly employed staff and agencies on approved frameworks which are audited to provide assurance that pre‐employment clearance has been obtained for agency staff;
* We adhere to National NHS Employment Checks/Standards this includes right to work in the UK, employees’ UK address and factual references.
* Implement 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 and Conditions of employment and access to training and development opportunities;
* Consult and negotiate with Trade Unions on proposed changes to employment, work organisation and contractual relations;
* Have systems to encourage the reporting of concerns including a whistleblowing policy so that all staff know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals, and the promotion of our Freedom to Speak up Guardians and Ambassadors;
* Purchase most of our products from UK or EU based firms, who may also be required to comply with the requirements of the UK Modern Slavery Act (2015) or similar legislation in EU states;
* Purchase a significant number of products through NHS Supply Chain, whose ‘Supplier Code of Conduct’ includes a provision around forced labour;
* Our purchase orders and tender specifications comply with the NHS Standard Terms and Conditions, thereby complying with the UK Modern Slavery Act (2015), all of which set out our commitment to ensuring no modern slavery or human trafficking related to our business;
* Ensuring that our suppliers are carefully selected through our robust supplier selection criteria and processes. All NHS Contracts for the Supply of Goods and Provision of Non-Clinical Services have contractual clauses requiring compliance with the Modern Slavery Act (2015);
* Evaluate specifications and tenders with appropriate weight given to modern slavery and human trafficking points through inclusion within the Social Value criteria scored section of tenders which is mandatory for all tenders;
* Uphold professional codes of conduct and practice relating to procurement and supply, including through adherence to Sustainable and Ethical Values as advocated through the Chartered Institute of Procurement and Supply and/or other appropriate professional bodies; and
* Where possible and consistent with the Public Contracts Regulations, build long‐standing relationships with suppliers.

**6. Training and Awareness**

Advice and training about modern slavery and human trafficking is available to staff through our Safeguarding Children and Adults training, our Safeguarding policies and procedures and our Safeguarding leads.

As part of our recruitment process we consider the extent applicants have knowledge and skills to comply with their obligations to safeguard service users which includes Modern Slavery and Human Trafficking.  It is extremely important to Oxford Health that all employed staff are supported to recognise signs and indicators of abuse which includes concerns relating to modern slavery and human trafficking. We have a responsibility as an organisation delivering care and treatment to vulnerable children and adults and we take this duty very seriously.

The organisation monitors any modern slavery issues through our Safeguarding Service and together with partner agencies.

We operate a Management of Concerns Policy (HR07) (whistleblowing) and have in place Freedom to Speak Up Guardians so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.

**6. Board of Directors’ Approval**

This statement has been approved by the Board of Directors of OHFT who will continue to support the requirements of this legislation. The Board will aim to review and update it on an annual basis. The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Oxford Health NHS Foundation Trust’s slavery and human trafficking statement for the financial year ended 31st March 2022.