

## **Slavery and Human Trafficking Policy Statement**

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019.*

### **1. Introduction**

At Greater Manchester Mental Health NHS Foundation Trust (GMMH) we are committed to ensuring that modern slavery or human trafficking is not taking place in any part of our business or supply chain. This statement sets out the steps that GMMH has taken, and continues to take, to understand all potential modern slavery and human trafficking risks and to implement effective systems and controls.

### **2. Organisational Structure**

The Trust provides inpatient and community-based mental health care for people living in Bolton, Salford, Trafford and Manchester, and a wide range of more specialist mental health and substance misuse services across Greater Manchester, the North West of England and beyond.

We employ over 5,400 whole time equivalent members of staff who deliver services from over 140 locations. In a 12-month period, we see in the region of 53,000 services users.

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

### **3. Our Policies on Slavery and Human Trafficking**

We are fully aware of the responsibilities we bear towards our service users, employees and local communities. We are committed to acting ethically and with integrity and transparency in all of our business dealings and to putting effective systems and controls in place to safeguard against any modern slavery taking place within any part of our business or supply chain. We have zero tolerance for any form of slavery or 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 internal policies and procedures. Our internal policies and procedures replicate our commitment to acting ethically and with integrity and include:

- **Recruitment/Employment Services:** We operate a robust recruitment policy. This includes undertaking appropriate pre-employment checks, in line with NHS Employment Standards, on directly employed staff and requiring NHS Professionals to provide assurance that pre-employment checks have been obtained for agency staff

- **Equal Opportunities:** We 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 of Conditions of employment and access to training and development opportunities
- **Organisational Change:** We consult and negotiate with Trade Unions on proposed changes to employment, work organisation and contractual relations
- **Safeguarding Policies:** We adhere to the principles inherent within both our Safeguarding Children and Safeguarding Adults at Risk Policies. These provide clear guidance to our employees as to how to raise safeguarding concerns about how colleagues or individuals receiving our services are being treated, or about practices within our supply chain.
- **Raising Concerns and Freedom to Speak Up Policy:** Our Freedom to Speak Up (Whistleblowing) Policy reminds employees of their responsibility to raise concerns about how colleagues or individuals receiving our services are being treated, or about practices within our supply chain, without fear of reprisal.

To identify and mitigate the risks of modern slavery and human trafficking in our procurement processes and management of our supply chain we:

- Where possible, and consistent with the Public Contracts Regulations, build long-standing relationships with suppliers
- Purchase most of our products/services 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 other EU states
- Purchase a significant number of products/services through NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour
- Require all suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through agreement of our 'Supplier Code of Conduct', purchase orders and tender specifications. All of which set out our commitment to ensuring no modern slavery or human trafficking related to our business
- Uphold professional codes of conduct and practice relating to procurement and supply, including through our procurement staff being members of the Chartered Institute of Procurement and Supply

#### 4. Training

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.

## 5. Performance Indicators

We will know the effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from our staff, service users, the wider public or law enforcement agencies which indicate that modern slavery practices have been identified.

## 6. Board of Directors' Approval

This statement has been approved by the Board of Directors of GMMH, who will review and update it on an annual basis.



Neil Thwaite  
Chief Executive

Date: 20 May 2019



Rupert Nichols  
Chair

Date: 20 May 2019