

Modern Slavery Act 2015 and Transparency in Supply Chains Act 2010

OVERVIEW

This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out the approach taken by Wiltshire Health and Care to ensure that slavery, servitude, forced labour and/or human trafficking (together Modern Slavery) does not exist in our supply chains. This statement covers the period up to the financial year ending 31 March 2019.

OUR BUSINESS AND VALUES

Wiltshire Health and Care LLP is the provider of NHS community services for patients living or residing in Wiltshire.

Our registered address is Chippenham Community Hospital, Chippenham, Wiltshire, SN15 2AJ.

Our members are the three local NHS Foundation Trusts:

- Great Western Hospitals NHS Foundation Trust
- Royal United Hospitals Bath MNHS Foundation Trust; and
- Salisbury NHS Foundation Trust.

We provide community nursing, physiotherapy, and occupational health services to patients who benefit from being cared for in their homes. This is supported by a team of specialised community services, who treat patients both at home and in clinic to provide services such as tissue viability, podiatry, orthotics, continence, heart failure, respiratory, PACE and oxygen, lymphedema, diabetes, dietetics, MSK, speech and language therapy, and wheelchair and specialist seating services. We also provide support for those with learning disabilities. We care for patients in community wards in three parts of the county (Chippenham, Warminster, and Marlborough), support intermediate care and therapy, and run the Minor Injuries Units in Chippenham and Trowbridge. We work as part of the local health and social care economy with our acute care partners, local primary care, social care colleagues, Carers Support Wiltshire, and many other third sector agencies. Of course, this is supported by a broad network of family members, friends, carers, and volunteers.

We have an overarching principle of removing the organisational barriers to healthcare to ensure that patients receive a seamless experience.

Wiltshire Health and Care has around 1400 employees and operates only out of Wiltshire, England, which is deemed a low risk country by the global slavery index.

We have a zero-tolerance approach to modern slavery. Our Executive team operates to develop and oversee a series of measures, our “*Modern Slavery Oversight Measures*” (described below), to prevent modern slavery and human trafficking from touching our

Working in partnership

Great Western Hospitals NHS Foundation Trust
Royal United Hospitals Bath NHS Foundation Trust
Salisbury NHS Foundation Trust

business and supply chains. As a result, we expect the same standards from all our contractors, suppliers and other business partners.

OUR SUPPLY CHAINS

We buy a wide range of goods and services, from medicines, and consumables, through to clinical clothing and waste disposal. The majority of these products and services are used in the provision of healthcare to patients.

Hundreds of suppliers engage with us, who in turn have their own supply chains, making our end-to-end supply chains complex.

MODERN SLAVERY OVERSIGHT MEASURES

In order to ensure other organisations comply with our own standards and values, we are developing Modern Slavery Oversight Measures to assess and manage supply chain risk. This shall include undertaking due diligence on our key suppliers by periodically auditing their modern slavery statements and requesting mandatory compliance terms in supply contracts that we directly negotiate. We will focus our supplier due diligence by identifying higher risk suppliers by category of product and/or the geography of their operations, with reference to the global slavery index.

Where a key supplier does not satisfy us of their position on modern slavery, we will work with them to raise standards in this area. If there is a lack of engagement or sufficient assurances, we will review the continued use of that supplier with a view to changing to a supplier which is able to meet our standards on modern slavery.

TRAINING AND POLICIES

We are developing a training package on modern slavery obligations and the Modern Slavery Act. This will be made available to all staff but will be a mandatory requirement for our staff involved in recruitment and contract management (“Relevant Staff”). In 2019/20, we will continue to develop our training programme to inform and raise awareness on modern slavery across Wiltshire Health and Care and look to assess engagement and understanding through future staff surveys/ engagement exercises.

We have a clear Anti-Modern Slavery and Human Trafficking Policy, and are also reviewing and updating all relevant policies that touch on the issues arising under the Modern Slavery Act.

RAISING CONCERNS

We are committed to dealing with any concerns raised in an open and honest manner, empowering and protecting those who raise concerns. Our staff can report concerns through a variety of channels including our Freedom to Speak up Guardians.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

As part of our Modern Slavery Oversight Measures, our Executive Committee will monitor the following key indicators:

- Any modern slavery concerns raised through the Freedom to Speak up (or other) routes.
- The results from the audit of our suppliers' modern slavery statements.
- The position with respect to suppliers (with whom we are directly negotiating agreements) being signed up to clear modern slavery terms via our contractual arrangements.
- The position with regards to our Relevant Staff completing modern slavery training.
- The position with regards to internal audit on the payments made to our staff, and their respective rights to work in the UK.

Our Executive team will periodically (and no less than annually) reflect upon the above, and use that intelligence to inform the development of the strategy and policy for combating modern slavery within Wiltshire Health and Care. Any such developments would be presented to our Board for endorsement.

This statement is approved by the Board and signed on its behalf by:



Douglas Blair
Managing Director
Wiltshire Health and Care

August 2019