

Modern Day Slavery Statement

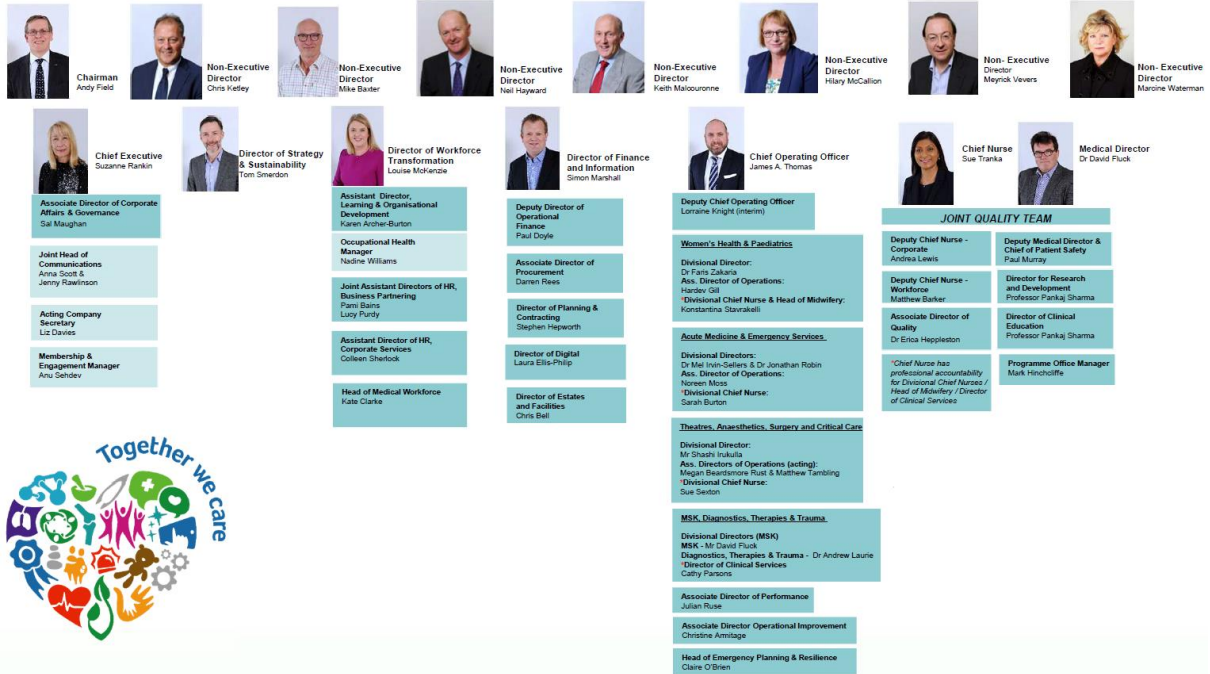
INTRODUCTION

Ashford and St Peter's Hospitals NHS Foundation Trust is increasingly aware of bonded labour and human rights issues within its supply chains, and is requesting that suppliers immediately implement ethical sourcing procedures. If this is not applied, the Trust will suffer reputational and possibly legal damage including the risk of loss of both consumer confidence and market share if we are found to be sourcing from suppliers who use exploitative labour. Suppliers may also face legal repercussions if their suppliers are involved in illegal conduct within its supply chain, irrespective of whether it happens abroad. Unfortunately, slavery and human trafficking still transpires in our modern society; and we collectively have a responsibility to be aware of the risks, however small, in our business and in the wider supply chain. We all have a duty of care to report concerns and immediately act upon them. The Trust may conduct random checks to establish that suppliers provide a track record of ethical procurement activity within its supply chain to encourage investment and improve employee morale as well as exceed legal requirements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and establishes Procurement's slavery and human trafficking statement for the current financial year and has been approved by the Board and signed by our Director of Finance.

TRUST ORGANISATIONAL STRUCTURE

Please see details of our Organisational Structure below



OUR BUSINESS

We are the largest provider of acute hospital services in Surrey, serving a population of more than 380,000 people in the boroughs of Runnymede, Spelthorne, Woking and parts of Elmbridge, Hounslow, Surrey Heath and beyond.

Ashford Hospital is situated on the A30 to the west of London, close to the junction 13 of the M25 and Heathrow Airport.

St. Peter's Hospital, Chertsey is situated in greenbelt parkland between Woking and Chertsey near junction 11 of the M25.

The Trust has an annual turnover in excess of £36m.

OUR SUPPLY CHAINS

The requirements of the Act have reporting implications for the Trust as an organisation and

for many of our suppliers. From an initial assessment, approximately 1000 of our suppliers would fall within the threshold for reporting although this may increase as we validate supplier turnovers and more tenders are awarded.

Currently all awarded suppliers sign up to our terms and conditions of contract which will soon contain a provision around 'forced labour'. In addition an increasing number of suppliers are implementing the Labour Standards Assurance System (LSAS) as a condition of contract for tenders within high risk sectors and product categories and indeed this has been referenced in the Government's Modern Slavery Strategy. Many aspects of the LSAS align to the seven reporting areas that the Government has outlined and should appear within any slavery and human trafficking statement.

OUR POLICIES ON SLAVERY AND 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; including implementing and enforcing effective systems and controls place to ensure slavery and human trafficking is not happening anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and alleviate risk we:

- ensure that our suppliers are carefully selected through our robust supplier selection criteria/processes
- require that the main contractor provide details of its immediate sub-contractor(s) to enable the Trust to check its credentials
- randomly request that the main contractor provide details of its supply chain
- wherever possible source locally and award contracts to local suppliers and SMEs
- our invitation to tender document contains a clause on human rights issues

- our invitation to tender document also contains clauses giving the Trust the right to terminate a contract for failure to comply with labour laws.
- are also liaising with the Department of Health to ensure that human rights issues are also reflected in our standard PQQ and terms and conditions of contract

SUPPLIER ADHERENCE TO OUR VALUES

We are zero tolerant to slavery and human trafficking and thereby expect all our direct and indirect suppliers/contractors to follow suit.

Where it is verified that a subcontractor has breached the child labour laws or human trafficking, then this subcontractor will be excluded in accordance with Regulation 57 of the Public Contracts Regulations 2015. The Trust will require that the main contractor substitute a new subcontractor.

TRAINING

We are looking at ways to increase awareness within our team 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.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We will use the following key performance indicators (KPIs) to measure how effectively we have been ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- internal and external auditors
- a policy commitment to meet our responsibility to respect human rights
- a human rights due diligence process to identify, prevent, lessen and account for how we address the impact on human rights
- processes to enable the remediation of any adverse human rights impacts which they

cause or to which they contribute.

Alex Williams

Associate Director of Procurement

Supplies and Procurement