

The NHS Confederation

Charity number 1090329 Company number 04358614

Modern Slavery and human trafficking statement

Date Statement First agreed by CEO

This version agreed by CEO

Date of review

Owner of policy

6 October 2022

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Director of People and Governance

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Introduction

This document sets out the steps the NHS Confederation has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

This statement is voluntary and published in line with section 54(1) of the Modern Slavery Act 2015 whereby organisations are required to produce a Modern Slavery Statement each year.

About NHS Confederation

The NHS Confederation is the membership organisation that brings together, supports, and speaks for the whole healthcare system in England, Wales, and Northern Ireland.

We support our members in three main ways:

- We represent organisations and sectors, to ensure local organisations and systems work in the best interests of service users, citizens, and staff.
- We connect the whole healthcare system, to boost system working and develop solutions to shared challenges.
- We support leaders to develop and hone their leadership skills, equipping leaders with tools, ideas and insights and connecting them with a community of leaders.

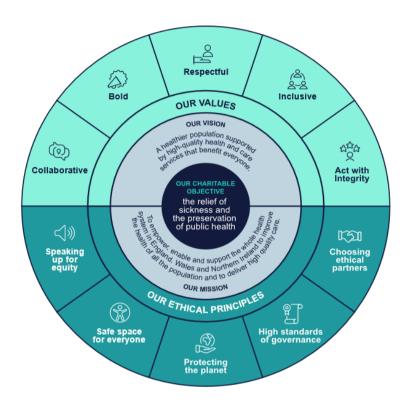
The charity is a company limited by guarantee and was incorporated on 23 January 2002 (Charity number 1090329, Company Number 04358614).

The charity has a subsidiary called The NHS Confederation (Services) Company Limited incorporated as a company limited by guarantee (Company Number: 05252407).

For more information visit What We Do on our website.

Our commitment to the principles of the Modern Slavery Act 2015

The NHS Confederation has an ethical framework which sets out five key principles that support our values and our charitable purpose:



As part of our ethical approach the NHS Confederation is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

We're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Governance and accountability

We are committed to continuous improvement in our approach to tackling modern slavery. We review our Modern Slavery Statement annually, aligning with best practice. It is approved by our CEO and published on our website.

Any concerns over modern slavery, our findings and remediations will be reported directly to our board of trustees.

Our supply chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited, and we procure goods and services from a restricted range of UK and sometimes overseas suppliers through a thorough procurement process. Approximately 95% of our suppliers are based in in the UK and the majority of our cost base is UK based consultancy and research.

We have a published Ethical Standards for Suppliers on our website that we expect all our Suppliers to adhere to. These standards embrace our Ethical Framework and support our approach to preventing modern slavery.

We reserve the right to audit suppliers and terminate contracts where evidence of modern slavery is found.

Organisational Policies

The following policies support our approach to the Modern Slavery Act:

- Recruitment Policy
- Pay and Grading Policy
- Procurement and Value for Money Policy
- Anti-financial Corruption Policy
- Whistle-blowing Policy

- Safeguarding Policy
- Fairness and Respect Policy

Other key documents to support this area include our Ethical Principles Framework, Equality, Diversity and Inclusion strategy, our values and behaviours, and our Standing Financial Instructions and Scheme of Delegation.

Reporting Concerns

We encourage staff, suppliers, and the public to report any concerns about modern slavery or human trafficking. Reports can be made confidentially through our whistleblowing or complaints channels. All concerns are investigated, and appropriate action is taken, including support for victims and corrective action with suppliers. We are committed to disclosing any incidents and the steps taken in response.

Embedding the principles

We will continue to embed the principles through:

Our People

- providing awareness and education to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers are fully aware of modern slavery and ethical employment practices

Our recruitment

- continuing to undertake our checks on new employees to check they are legally allowed to work in the UK
- continuing to not offer zero hour contracts
- continuing to ensure all staff are paid in line with real living wage (national and London).

Our supply chain

- ensuring that consideration of the modern slavery risks and prevention are added to NHS Confederation's policy review process as an employer and procurer of goods and services
- making sure NHS Confederation procurement strategies and contract terms and conditions include references to modern slavery and human

- trafficking and providing evidence that all individuals have a right to remain and work in the UK.
- continuing to take action to embed a zero-tolerance policy towards modern slavery. We have an option to terminate contracts for any breach of social or labour laws.