

Cwm Taf Morgannwg University Health Board Modern Slavery Statement – 2023 / 2024

Cwm Taf Morgannwg University Health Board (the health board) takes our responsibilities to prevent modern slavery and human trafficking within our supply chain seriously. To fulfil the requirements of Section 54 of the Modern Slavery Act 2015 (“Act”), our annual modern slavery statement sets out the organisation’s approach to modern slavery, human trafficking, forced labour and labour rights violations in employment and our supply chains.

The statement relates to the health board, including our three hosted organisations, Emergency Ambulance Service Committee (EASC), the National Imaging Academy and the Welsh Health Specialised Services Committee (WHSSC).

About us and our supply chain

Cwm Taf Morgannwg University Health Board is one of seven health boards operating in Wales, with responsibility for the planning and delivery of NHS services. We provide primary, community, hospital and mental health services to the 450,000 people living in three County Boroughs of Bridgend, Merthyr Tydfil and Rhondda Cynon Taf.

The health board is required to purchase a large amount of goods and services to enable it to operate efficiently and effectively. The NHS Wales Shared Services Partnership (NWSSP) Procurement Services manages the purchasing of goods and services on the health Board’s behalf.

The health board became an accredited Living Wage Employer on 9 February 2023. We are now committed to paying the real living wage not only to our directly employed employees and workers (who are already paid the real living wage), but also that our third party contractor and supplier who provide goods and services to the health board, also pay it to their workforce. Therefore in 2022 / 2023 the health board has strengthened our procurement processes to ensure that where our third party contractor and supplier employees are not currently paying their workforce the real living wage they will do so in the future

Current Procurement policy and processes

The health board, through the work undertaken by the NWSSP Procurement Services on our behalf, adheres to UK public sector procurement legislation, including “Public Contracts Regulations 2015”, which ensures that all potential and current suppliers are dealt with

professionally, fairly and ethically and that we uphold the principles of sustainable procurement at all times.

NWSSP Procurement Service adherence to the legislation also ensures that our procurement processes identify and address environmental management, health and safety and equality legislation, which enables the health board to manage risks relating to safeguarding and modern slavery.

Through our procurement framework and the monitoring of contracts, the health board requires our contractors and suppliers to maintain their standards and treatment of their employees, while supplying us with goods and services.

We have a Raising Concerns Staff Policy and a dedicated SharePoint page, along with a Respect and Resolution Policy, Procedure for Dealing with Anonymous Communications and Concerns Policy, which of which, provide our staff, patients and the public with a voice to raise of concerns relating to our contractor and supplier behaviour and treatment of their workforce.

Managing Risks and Adherence to the Act

NWSSP Procurement Services produces an annual [Ethical Employment Statement](#), which sets out their commitment to ensuring that all procurement activity, conducted on behalf of NHS Wales (which includes the health board), is undertaken in an ethical way. The Procurement Service's statement confirms that their processes aim to ensure that workers within the supply chain, through which we source our goods and services are fairly treated in line with Welsh Government's Code of Practice for Ethical Employment in Supply Chains.

This commitment specifically ensures that any part of the health board's supply chain complies with all elements of the Code of Practice including:-

- Modern slavery and human rights abuses;
- Blacklisting;
- False self-employment;
- Unfair use of umbrella schemes and false self-employment; and
- Paying the real living wage.

The health board has assurance from NWSSP Procurement Services that is has:-

- Embedded the Code of Practice in standard operating procedures, including terms and conditions of contract;
- Provided training to those involved in buying / procurement on

modern slavery and ethical employment practices, through various training mediums;

- Aligned the Code of Practice within our broader Sustainable Procurement Code of Practice;
- Developed standard questions that ensure ethical employment practices are considered as part of the procurement process;
- Became a signatory to the Transparency in Supply Chains (TISC) register, and publishes a NWSSP Ethical Employment Statement; and
- Requested our suppliers to sign up to the TISC register, and publish their own ethical employment policies and statements.

and in addition it will:-

- Regularly conduct appropriate engagement with our suppliers, to ensure that the way in which they work does not contribute to the use of illegal or unethical employment practices within the supply chain;
- Maintain up to date knowledge of ethical employment issues and themes, ensuring continuing support of fair work related policy driven by the Welsh government;
- Promote that our second tier suppliers sign up to the Welsh Government's Code of Practice, to help ensure that ethical employment practices are carried out throughout their supply chains, as a condition of supply to NHS Wales; and
- Assess our expenditure to identify areas of high risk, and continue to address any issues of modern slavery, human rights abuses and unethical employment practice.

Social responsibility and human rights

In providing healthcare services to the population of Cwm Taf Morgannwg, we are committed to carrying out our undertakings in a socially responsible and ethic manner. We therefore, produce an annual modern slavery statement to demonstrate that we take our responsibilities to our workforce and third party contractor and supplier employees and workers seriously and will not tolerate any actions or behaviours, which violate their human rights.

We are committed to ensuring that no health board activity causes or contributes to modern day forms of slavery, by ensuring our People and Procurement Policies and Procedures are robust, with actions and conditions, which prevents it from happening, within our workforce, supply chain or elsewhere. For example:-

- We have robust recruitment and selection processes, which requires pre-employment checks to be undertaken when appointing new employees or bank workers. This approach ensures were know who we are employing;

- We have a robust procurement process, which requires third party contractors and suppliers to undertake relevant checks on their employee's and worker's. This ensures the health board has assurances that these employees and workers are treated fairly in line with Welsh Government's Code of Practice for Ethical Employment in Supply Chains;
- We have in place the following open and transparent People policies and procedures; Anonymous Communication Policy, Raising a Concern Policy and Respect and Resolution Policy, all of which ensure our employees and workers have a voice and are able to raise concerns of this nature, in a manner, in which they feel most comfortable;
- We have a Concerns Policy, which ensures our patients, service users and family members etc. have a voice and are able to raise concerns of this nature with the health board;
- We raise awareness and provide training related to modern slavery to protect our employees, workers, third party contractors and suppliers, our patients and service users, along with our reputation.

Training

The health board recognises the importance of ensuring all of our employees and workers understand how modern slavery manifests itself and how to report it when it does. This is especially relevant within a healthcare setting, as our employees, workers, patients, service users, family members, contractors and suppliers have multiple interaction with a diverse range of people on a daily basis, which increases the potential to detect potential modern slavery abuses.

Our statutory and mandatory training provides information to raise employee's and worker's awareness of the issue of modern slavery. All employees and workers are required to complete the following modules on a regular basis: Equality, Diversity and Human Rights, Health, Safety and Welfare, Safeguarding Children and Safeguarding Adults.

NWSSP Procurement Service's employees involved in procuring and buying goods and services on behalf of the health board, are required to undertake training on modern slavery and ethical employment practices.

Next steps

The health board is committed to continuously improving in this area and it will review and monitor and, where necessary, enhance our standards, policies, procedures and processes, as well as improving awareness raising, training and communications, regarding the Modern Slavery Act.

Cwm Taf Morgannwg University Health Board Declaration

This statement is made to comply with Section 54 of the Modern Slavery Act 2015. The Cwm Taf Morgannwg University Health Board has approved the statement and it has been signed on its behalf by Paul Mears, Chief Executive Officer.

A handwritten signature in black ink, appearing to read 'Paul Mears', with a long, sweeping underline stroke extending to the right.

Date: 14 April 2023

Paul Mears
Prif Weithredwr/
Chief Executive Officer