Worcestershire Acute Hospitals NHS Trust

Modern Slavery and Human Trafficking Act 2015 Statement

1. Background

Section 54 of the Modern Slavery Act 2015 requires all organisations to set out the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its business.

Every organisation in the UK with a total annual turnover of £36m or more, is required to produce a slavery and human trafficking statement for each financial year.

Statutory guidance supports organisations in how to meet the requirements of the Act: *Slavery and human trafficking in supply chains: guidance for businesses, Government guidance for organisations (last updated December 2025).*

As an NHS Provider with a turnover for 2025/26 of £832m, Worcestershire Acute Hospitals NHS Trust is required to make a public statement as to the actions we have taken to detect and deal with forced labour/ and trafficking in our supply chains - the Transparency in Supply Chains obligation.

The Act requires a slavery and human trafficking statement to be approved and signed at Governing Body level. This ensures senior level accountability, leadership and responsibility for modern slavery and gives it the serious attention it deserves.

2. Modern Slavery

Modern Slavery is an umbrella term that encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force vulnerable individuals into a life of abuse, servitude and inhumane treatment. A large number of active organised crime groups are involved in modern slavery. However, it is also committed by individual opportunistic perpetrators.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist.

Someone is in slavery if they are:

- forced to work - through mental or physical threat;
- owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- dehumanised, treated as a commodity or bought and sold as 'property';

- physically constrained or has restrictions placed on his/her freedom of movement.

Contemporary slavery takes various forms and affects people of all ages, gender and races. Victims are often hidden away, may be unable to leave their situation, or may not come forward because of fear or shame.

It looks likely that the number of victims of modern slavery globally will continue to rise over the coming years. Many victims are found working in the construction industry, agriculture, sex industry, nail bars, car washes, and cannabis farms. Children are found working in all of these situations, as well as in sexual slavery.

Many victims have been trafficked from overseas, and their exploitation often begins en route. British victims tend to have fallen on difficult times, making them vulnerable to the lure of well-paid work complete with decent accommodation, which often proves to be a cruel lie.

Most victims are 'recruited' in person, although some who find themselves trapped in the sex industry have been ensnared through online job adverts and social media websites.

In some cases, victims are threatened and can suffer extreme violence as the criminals exert control. Many have their identity documents confiscated and have most of their earnings withheld as 'payment' for living costs or for their journey to the UK.

Although some larger organised crime groups are involved, people are also trafficked by looser collaborating networks often involved in additional forms of serious criminality, including drugs and firearms trafficking.

The importance of spotting the signs early, raising awareness and reporting are therefore key, in order to safeguard victims and bring the traffickers to justice (National Crime Agency).

3. Worcestershire Acute Hospitals NHS Trust Statement of intent

Worcestershire Acute Hospitals NHS Trust fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role the NHS has to play in both identification, combatting it, and supporting victims.

Worcestershire Acute Hospitals NHS Trust is committed to ensuring that no modern slavery or human trafficking takes place in any part of our business or our Supply Chain.

This statement sets out actions taken by Worcestershire Acute Hospitals NHS Trust to understand all potential modern slavery and human trafficking risks in accordance with the Statutory Guidance.

Worcestershire Acute Hospitals NHS Trust adheres to safer recruitment principles, in line with NHS Employers' Standards, including the requirements in respect of identity checks, work permits and criminal record checks.

4. Partnership working

Where concerns in relation to modern slavery or human trafficking are identified, Worcestershire Acute Hospitals NHS Trust commits to working with the relevant authorities in order to safeguard those at risk.

5. Organisational Structure

Worcestershire Acute Hospitals NHS Trust is a large acute and specialised hospital Trust that provides a range of local acute services to a population of more than 600k people in Worcestershire as well as caring for patients from surrounding counties and further afield. The Trust's catchment population extends beyond Worcestershire itself, as patients are also attracted from neighbouring areas including South Birmingham, Warwickshire, Shropshire, Herefordshire, Gloucestershire and South Staffordshire.

The Trust provides hospital based services from three main sites; the Alexandra Hospital in Redditch, Kidderminster Hospital and Treatment Centre, and Worcestershire Royal Hospital in Worcester as well as some community based services.

We employ in the region of 8000 staff and volunteers who support the organisation to deliver the services we provide. Our annual turnover was £832 million for the financial year 2025/26.

6. Our Policy on Slavery and Human Trafficking

When procuring goods and services, we apply standard NHS Terms and Conditions for clinical and non-clinical procurement and NHS Standard Subcontract (for clinical outsourced service procurement). Both require suppliers to comply with relevant legislation related to PPN 02/23 "Tackling Modern Slavery in Government Supply Chains".

The Trust has internal policies and procedures in place that assess supplier risk in relation to the potential for modern slavery or human trafficking via the Atamis e-commerce Procurement tool which contains a risk assessment tool and relevant Supplier Questionnaires. The top 80% of suppliers nationally, affirm their own compliance with the modern slavery and human trafficking act within their own organisation, sub-contracting arrangements and supply chain.

All members of staff have a personal responsibility to work with the procurement department in order for the successful prevention of slavery and human trafficking. The procurement department takes responsibility where a National Framework Agreement or formal exercise in line with standing financial instructions (SFI) has been undertaken.

All staff and volunteers working within Worcestershire Acute Hospitals NHS Trust, receive mandatory safeguarding training at a level in accordance with their job role.

All staff and volunteers are contractually obligated to work in accordance with Worcestershire Acute Hospitals NHS Trust policies and procedures.

7. Reporting concerns

Worcestershire Acute Hospitals NHS Trust has systems in place to encourage the reporting of concerns and has a named Freedom to Speak up Guardian and Freedom to Speak Up (raising concerns) Policy. This is further supported by Freedom to Speak Up champions across the organisation.

Safeguarding concerns in relation to modern slavery and human trafficking are reported in to a first responder organisation such as the Police, adult or children's Social Care Safeguarding teams or directly to the Modern Slavery Helpline.

The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. Modern slavery is a complex crime and may involve multiple forms of exploitation.

Worcestershire Acute Hospitals NHS Trust has an integrated safeguarding team available to staff to provide signposting, advice and support.

8. Associated Policy & Procedure

The Trust has a number of Policies and Procedures that support this statement:

- Safeguarding Adults, Children and Young People
- Recruitment and Selection
- Procurement Strategy
- Freedom to Speak Up

9. Due Diligence within our Supply Chain

Our Supply Chain is made up of a number of large multi-national companies, Small to Medium Enterprises (SME's) and small local suppliers who make up a total of 2500 live suppliers to the Trust at this current time.

The location of supplier premises and manufacture locations are spread globally but the vast majority are situated in the European Union, where it is estimated that several

hundred thousand people work for the aforementioned suppliers although not all these people work on Worcestershire Acute Hospitals NHS Trust related goods and services.

Due to the nature of our business and our approach to governance and risk management, we assess that there is low risk of slavery and human trafficking in our business and supply chains. However, we will continue to periodically review the effectiveness of our relevant policies, procedures and associated training to ensure that the risk remains low.

Therefore, to identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain we will:

- Purchase a significant number of products through NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour;
- Utilise national Contracts and Framework Agreements that contain specific clauses around this subject;
- Where possible, build long standing relationships with suppliers to improve transparency and mitigate any risks;
- Procurement approach informed by risk levels, using SQ (Standard selection Questionnaire) declarations, the Social Value Model, Key performance indicators (KPIs) and Contract terms;
- The Trust will request 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 will 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 Team's membership of the Chartered Institute of Procurement and Supply;
- The Trust will request all suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through acceptance of the standard Terms and Conditions of contract for the procurement of goods and services;
- As an NHS Provider, the Trust undertakes audit in accordance with NHS financial reporting standards.

10. Training

Worcestershire Acute Hospitals NHS Trust recognises safeguarding as a high priority for the organisation and has clear policies and procedures in place in relation to safeguarding children, young people and adults. Modern slavery and human trafficking is included in all levels of mandatory safeguarding adult and children training.

Clear links to support / resources are available for staff on the Trust Safeguarding Hub via Sharepoint.

The procurement department's senior procurement team are all Chartered Institute of Purchasing and Supply (CIPS) qualified and abide by the CIPs code of professional conduct.

In order to upskill staff to raise awareness and apply the process to drive risk mitigation, NHS bitesize training and Government Commercial College training on modern slavery is also promoted.

11. Risk Assessment

Worcestershire Acute Hospitals NHS Trust considers the principal risks related to slavery and human trafficking and identifies them as:

- Reputational
- Lack of assurances from suppliers
- Lack of anti–slavery clauses in contracts
- Training staff to maintain the trust's position around anti-slavery and human trafficking.

In relation to slavery or human trafficking, any instance would be treated as a breach of law, our supplier standards and/or our local policies and therefore acted upon accordingly.

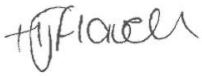
12. Aim

The aim of this statement is to demonstrate that Worcestershire Acute Hospitals NHS Trust follows good practice and that all reasonable steps are taken to prevent modern slavery and human trafficking.

13. Executive Directors' Approval

The Executive Director Lead for Safeguarding has considered and approved this statement on behalf of the Board and will continue to support the requirements of the legislation.

Signed:



Hayley Flavell
Chief Nursing Officer