

## **NHS Humber Health Partnership**

### **Modern Slavery Statement** **1 April 2024 to 31 March 2025**

#### **1. Introduction**

The Modern Slavery Act 2015 requires organisations to publish an annual Modern Slavery Statement on their website within six months of the end of the financial year (i.e., for the Trust this would require the statement to be published by 30 September).

With reports<sup>1</sup> of modern slavery victims increasing year on year and an estimate of more than 130,000 people being trapped in modern slavery, costing the UK £33 billion per year, it is imperative that the Trust/Group continues to be committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

This statement sets out the steps that the Trust has taken over the financial year 1 April 2024 to 31 March 2025 to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains and covers the following:

- Organisational structure and business
- Policies in relation to slavery and human trafficking
- Due diligence and managing risks in the Trust's business and supply chains
- Training and performance indicators

#### **2. Organisational Structure and Business**

Northern Lincolnshire and Goole NHS Foundation Trust (NLaG) operates out of three hospital sites with approximately 750 beds offering a mix of acute and community services. Together they serve a local population of more than 450,000 people and provide inpatient, day care and outpatient services. The Trust is one of the biggest employers in the region with over 6,500 members of staff. The Trust has an annual income of circa £524m.

Hull University Teaching Hospital NHS Trust (HUTH) is a large acute NHS Trust situated in Kingston upon Hull and the East Riding of Yorkshire. The Trust employs over 9,000 staff, has an annual income of circa £886m and has two main sites: Hull Royal Infirmary and Castle Hill Hospital. Outpatient services are also delivered from locations across the local health economy area.

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<sup>1</sup> <https://www.antislavery.org/slavery-today/slavery-uk/>

Further details regarding the Trust's business and structure can be found in the Annual Report and Accounts 2023/24, available on the Trust website NLaG [Annual reports and accounts - Northern Lincolnshire and Goole NHS Foundation Trust \(nlq.nhs.uk\)](https://nlq.nhs.uk) and HUTH [annualReport2324.pdf](#)

- Note the NLaG and HUTH Annual Reports for 2024/2025 are not currently available.

### **3. Policies in Relation to Slavery and Human Trafficking**

The Group has several policies to support staff in relation to modern slavery, including:

- Freedom to Speak Up Policy for the NHS.
- Group Conflict Resolution Policy.
- Domestic Abuse Guidance/Policy.
- Raising Concerns at Work Policy (HUTH).
- Equality, Diversity and Inclusion in Employment Policy (HUTH)
- Raising Concerns via:
  - Zero Tolerance to Racism Framework
  - Zero Tolerance to Ableism Framework
  - Zero Tolerance to LGBTQIA Discrimination Framework

The Trust publishes a broad range of safeguarding policies and factsheets, for both service users and staff, which include:

- Safeguarding Adults Policies.
- Safeguarding Children Policies.

Any new campaigns/policies in relation to modern slavery are published on the Group intranet.

All Trust policies go through a robust consultation and ratification process and are available on the Group's internal website.

### **4. Due Diligence Processes in the Trust's Business and Supply Chains**

#### *Due Diligence in Business*

The Group is committed to preventing slavery and human trafficking in corporate activities and ensuring that workers are not exploited, that they are safe and that relevant employment (working hours etc.), health and safety, human rights laws and international standards are adhered to.

To support staff, the following steps are taken:

- All staff are employed on employment contracts which comply with UK law.
- Pre-employment checks are undertaken on all workers directly and non-directly employed by the Trust (e.g., employees, agency staff, contractors, volunteers, students, and trainees on work experience etc.).
- All staff undertake mandatory safeguarding training, which covers modern slavery.
- As an equal opportunities' employer the Trust is committed to creating an inclusive working environment for all staff, which enables staff to feel

confident that they can raise concerns without any risk to themselves via several avenues, including a Freedom to Speak up Guardian.

- A comprehensive range of modern slavery and safeguarding information for service users and staff is available for staff on the Trust intranet.
- All active agencies who supply staff to the Trust are asked to provide assurance that they are compliant with the Modern Slavery Act 2015 on an annual basis.
- Modern slavery is a term used that includes any form of human trafficking, slavery, servitude or forced labour, as set out in the Modern Slavery Act 2015.
- Modern slavery is widespread and can go unnoticed in our daily lives. Victims may face physical violence or coercion and may be forced into overwhelming debt. Additionally, they may have their passports taken away and be threatened with deportation. To safeguard against this, the Trust is constantly seeking ways to support and protect staff and service users from modern slavery and human trafficking. Some of the steps taken to achieve this include:
  - Participation in the Humber Modern Slavery Partnership (HMSP) Strategic Board, a network of over 60 organisations in the Humber region dedicated to preventing and combating modern slavery.
  - Participation in the North East Lincolnshire Modern Slavery Partnership, a local network aimed at raising awareness of modern slavery.
  - Incorporating modern slavery into mandatory safeguarding adults training.
  - Sharing knowledge and information, including providing access to training across the Trust through the intranet.
  - Monitoring the number of concerns raised to the Trust safeguarding adults' team regarding exploitation and/or modern slavery. While these numbers are low, they show that staff understand of this aspect of safeguarding.
  - Collaborating with individuals to ensure that the principles of Making Safeguarding Personal are followed. Support and referrals should be consent-based and involve the person's input.
  - Professionals should also consider child trafficking and the possibility of the child or young person being used in different forms of exploitation such as child sexual exploitation, fraud, forced marriage, criminal activity such as pick pocketing, cannabis cultivation or domestic servitude. The consequences of such involvement can have both short- and long-term consequences for the child, including guilt and confusion.
  - The safeguarding children team raise awareness of the issue of modern slavery, child criminal exploitation (CCE) and child sexual exploitation (CSE) in their safeguarding children training.
  - The safeguarding children team are active members at Multi Agency Child Exploitation (MACE) meetings and at National Referral Mechanism (NRM) meetings following completion of safeguarding referrals to Police and Children Social Care.

### *Due Diligence in Supply Chains*

The Group contracts with suppliers through relevant procurement frameworks and is part of the Humber and North Yorkshire Procurement Collaborative (HNYPCC) which is a shared collaborative procurement and logistics service. The HNYPCC Modern Slavery Statement can be seen in Appendix 1.

The only local procurement activities which may fall outside of the HNYPC are the use of local providers by our estates department but they are working with the HNYPC to standardise approaches to all their procurement activities.

## 5. Training and Performance Indicators

Compliance with the Trust's modern slavery agenda is measured by reviewing the number of staff who have completed the following mandatory courses/eLearning packages (which include modern slavery):

- Safeguarding Adults
- Safeguarding Children

As of June 2025, 88% of NLaG staff and 92.8% of HUTH staff are compliant with the required safeguarding training.

The Safeguarding training and advice:



- Modern Slavery is included with the safeguarding adults and children training.
- The safeguarding adults and children's teams are available Monday / Friday 9.00 – 5.00pm to offer advice, support, and information to staff if they have concerns about identification of modern slavery and how to make appropriate referrals to safeguard adults and children.
- Gaining Respect and Finding Trust team) in children social care deliver bespoke training to wards and departments within the Trust which covers modern slavery, child criminal exploitation and child sexual exploitation.

## 6. Summary

The Trust continues to be committed to preventing modern slavery and human trafficking in any part of its business or supply chains. The Trust is committed to:

- Continuing to educate staff on the importance of preventing modern slavery and to meet the obligations under the national modern slavery agenda.
- Monitoring and reviewing ongoing modern slavery legislation and best practice.
- Obtaining assurances from main suppliers/agencies etc. that they comply with the Modern Slavery Act 2015 and record and monitor these as required.
- Reviewing Trust policies and including references to modern slavery where appropriate.

Trust Board has considered and approved this statement and will continue to support the requirements of the legislation.

<p>Signed</p>  <p><b>Group Chairman</b></p>	<p>Signed</p>  <p><b>Interim Group Chief Executive</b></p>
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## **Appendix 1**

# **Humber and North Yorkshire Procurement Collaborative Modern Slavery Statement 2024/25**

## **Foreword**

Modern slavery remains one of the greatest challenges of our time with millions of children and adults around the world suspected of being trapped within it. Modern slavery is so pervasive it is likely to exist in the supply chains of the goods and services purchased by public sector organisations.

The supply chains within the health system are varied, complex and far reaching, presenting risks of modern slavery throughout. It is no longer sufficient to state a zero-tolerance approach; instead, we commit to take active steps to eradicate any trace of modern slavery in our supply chains and monitor this throughout the life cycle of our contracts.

We all must play our part in tackling modern slavery. At the Humber & North Yorkshire Procurement Collaborative we care about workers in our supply chains and want to go further to mitigate the risk of modern slavery. Our promise to set an example, to share best practice and to train our procurement professionals.

This is the first modern slavery statement for the Humber & North Yorkshire Procurement Collaborative, a joint procurement function for Hull University Teaching Hospitals NHS Trust, Northern Lincolnshire and Goole NHS Foundation Trust and York and Scarborough Teaching Hospitals NHS Foundation Trust. This statement baselines the statements of the three organisations and demonstrates the depth and breadth of the buying activities across the collaborative.

Working across the collaborative we will take action to work with suppliers to identify modern slavery risks and eliminate them from our supply chains. Now as part of an annual reporting cycle, this statement will form the basis of our approach, ensuring that the taxpayers' pound is not helping criminals' profit from vulnerable people.

This statement is our commitment to continue to fight modern slavery and contribute to bettering the lives of millions of people around the world.

## **1. Introduction**

- 1.1 In March 2020, the UK became the first country to publish a government modern slavery statement, which sets out the steps that central government took in 2019 to eradicate modern slavery and human trafficking. The Modern Slavery Act 2015 requires all organisations to publish an annual Modern Slavery Statement to set out the steps their 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 own business.
- 1.2 The Humber & North Yorkshire Procurement Collaborative (HNYPC) is a shared collaborative procurement and logistics service for Hull University Teaching Hospitals NHS Trust, Northern Lincolnshire and Goole NHS Foundation Trust and York and Scarborough Teaching Hospitals NHS Foundation Trust.
- 1.3 HNYPC is an NHS organisation which supports the three NHS Organisations in providing clinical services across Humber & North Yorkshire. The three trusts employ around 26,800 members of staff, 135 of which are within the Procurement function.
- 1.4 HNYPC are committed to improving our practices to combat slavery and human trafficking. We are fully aware of our responsibilities we have towards patients, service users, employees and the local community. We have a robust set of ethical values that we use as guidance for our commercial activities. We also expect all suppliers to adhere to the same ethical principles.
- 1.5 The three NHS Trust Chief Executives have overall accountability for this statement. This statement covers the period from 1 April 2025 to 31 March 2026.
- 1.6 The statement covers the following:
  - Organisational structure, business and spend.
  - Policies in relation to slavery and human trafficking.
  - Due diligence in our business and supply chains.
  - Assessing and managing risks in our business and supply chains.
  - Our ambitions for the next 12 months.
  - Training in slavery and human trafficking.
- 1.7 The aim of this statement is to demonstrate that HNYPC follow good practice, and all reasonable steps are being taking to prevent slavery and human trafficking. All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking.

## **2. Structure, Business and Spend**

- 2.1 HNYPC is a shared collaborative procurement and logistics service for Hull University Teaching Hospitals NHS Trust, Northern Lincolnshire and Goole NHS Foundation Trust and York and Scarborough Teaching Hospitals NHS Foundation Trust.
- 2.2 Hull University Teaching Hospital NHS Trust is a large acute NHS Trust situated in Kingston upon Hull and the East Riding of Yorkshire. The Trust employs around 9,000

staff, has an annual income of circa £886m and has two main sites: Hull Royal Infirmary and Castle Hill Hospital. Outpatient services are also delivered from locations across the local health economy area.

- 2.3 Northern Lincolnshire & Goole NHS Foundation Trust operates out of three hospital sites with approximately 750 beds offering a mix of acute and community services. Together they serve a local population of more than 450,000 people and provide inpatient, day care and outpatient services. The Trust is one of the biggest employers in the region with around 6,500 members of staff. The Trust has an annual income of circa £524m.
- 2.4 York and Scarborough Teaching Hospitals NHS Foundation Trust and York Teaching Hospital Facilities Management LLP provide a comprehensive range of acute hospital and specialist healthcare services for approximately 800,000 people living in and around York, North Yorkshire, North East Yorkshire and Ryedale, an area covering 3,400 square miles. The Trust has an annual turnover approaching £1bn. We manage 8 hospital sites, 1,127 beds (including day-case beds) and have a workforce of 10,000 staff working across our hospitals and in the community.
- 2.5 Collectively the three NHS organisations have an income of £1.8bn and hold just over 2,400 commercial contracts with a value around £0.8bn. Non-pay spend is in excess of £500m per annum. Further information regarding each of the Trusts business is provided in their Annual Reports and Accounts which are available on each of the Trusts internet sites.
- 2.6 The main categories of expenditure include Medical & Surgical Consumables, Medical & Surgical Equipment, Estates & Facilities and Digital solutions. Each of these categories carries risk of modern slavery within the supply chain.
- 2.7 Each company that reaches the criteria for the requirement under section 54 of the Modern Slavery Act 2015 will publish their own independent modern slavery statements, independent from HNYPC; their activities are not covered by this statement.
- 1.8 The HNYPC does 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.

### **3. What is Modern Slavery & Human Trafficking?**

- 3.1 Modern Slavery can take many forms including the trafficking of people, forced labour, servitude and slavery. Any consent victims have given to their treatment will be irrelevant where they have been coerced, deceived or provided with payment or benefit to achieve that consent.  
<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
- 3.2 Modern slavery is the recruitment, movement, harbouring or receiving of children, young people or adults through the use of force, coercion, and abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.



## **4. Modern Slavery Policies**

- 4.1 The HNYPC procurement policy states that all procurements regardless of value must adhere to the principles of transparency, equal treatment, non-discrimination and proportionality. The HNYPC procurement policy requires that the transparency in supply chain guidance is embedded in all procurements. Where there is high risk of modern slavery in the supply chain, the policy requires that identified risks and mitigating actions are captured in the procurement strategy. Procurement strategies are required for every procurement.
- 4.2 HNYPC use standard terms and conditions of contract which include clauses that impose obligations on the contractor to mitigate against modern slavery risks in supply chains. These clauses adopt the recommendations and best practices referred to in the Modern Slavery procurement guidance published alongside PPN 05/19.
- 4.3 HNYPC relies on its suppliers for the delivery of many important public goods, works and services and it expects the highest standards of business ethics from all suppliers.
- 4.4 Procurement Policy Note (PPN) 06/20, published by Cabinet Office in September 2020, mandates that all procurements covered by the Public Contracts Regulations 2015 must include 10% evaluation criteria solely for social value themes, one of which is modern slavery. The proportion of procurements selecting modern slavery as a key social value theme will be reported upon in the next statement.
- 4.5 Each of the NHS organisations that HNYPC provide services to have their own policy in relation to modern slavery and these can be accessed via each of the trusts intranet pages. These include:
- Raising Concerns at Work (Whistleblowing) Policy.
  - Equality, Diversity and Inclusion in Employment Policy.
  - Policy for Staff Conflict Resolution and Professionalism in the Workplace.
  - Safeguarding Adults Policy.
- 4.6 All policies are reviewed on a regular basis to reflect any changes in legislation and are subject to a thorough consultation and ratification processes with input from staff side and management representatives, prior to being published on the Trust's intranet site.

## **5. Commitment**

- 5.1 The HNYPC have the patient at the heart of everything we do, and this is reflected in the way we run our business.
- 5.2 By publishing this statement the HNYPC believe it demonstrates its commitment to:
- Comply with the Modern Slavery Act 2015 and regulatory requirements.
  - Make suppliers and service providers aware that we promote the requirements of the legislation.
  - Develop an awareness of human trafficking and modern slavery within our workforce.
  - Consider human trafficking and modern slavery issues when making procurement decisions.



## **6. Risk Assessment and Due Diligence**

- 6.1 Modern slavery can affect virtually any industry and country, which is why HNYPC is working to target action where risks of exploitation are most severe, salient and strategic.
- 6.2 Each of the Trusts is committed to preventing slavery and human trafficking in corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. There is also a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (working hours etc.), health and safety, human rights laws and international standards are adhered to. Trust specific training is available to all staff and staff can raise concerns through their Freedom to Speak-Up Guardian, Fairness Champions or through the Whistleblowing Policy.
- 6.3 Each of the Trust's 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 abuse or coercion.
- 6.4 HNYPC expects that the supply chains it works with have suitable anti-slavery and human trafficking policies and processes in place. All tenderers are expected to respond to the question within the Selected Questionnaire document, tender document and quotation document to provide assurance that they adhere to the Modern Slavery Act. This assurance will be collected in a central database.
- 6.5 Individually the Trusts have been able to quantify the number of contracts/suppliers who have provided assurance that they adhere to the Modern Slavery Act and the figures relating to this can be found in the individual Trust statements. This work will be taken forward by the HNYPC.
- 6.6 All HNYPC staff uphold the Chartered Institute of Procurement and Supply (CIPS) code of professional conduct and practice relating to procurement and supply and have been briefed on the Modern Slavery Act. Those who are 'Chartered Status' have completed their annual Ethical Procurement and Supply test.
- 6.7 The following practices contribute to HNYPC managing risks within the organisation's business and supply chains:
- All staff are employed on employment contracts which comply with UK law.
  - Pre-employment checks are undertaken on all workers directly and non-directly employed (e.g. employees, Agency staff, contractors, volunteers, students and trainees on work experience etc.).
  - All staff undertake mandatory safeguarding training, which covers modern slavery.
  - A comprehensive range of modern slavery and safeguarding information is available for staff.
  - Individual Trusts have strong links with the Humber Modern Day Slavery Partnership.
  - The HNYPC asks all prospective suppliers to complete the Governments Standard Selection Questionnaire which requires prospective suppliers to confirm that they adhere to the Modern Slavery Act 2015.

## **7. Procurement Actions**

7.1 The current procurement processes dictates, all spend, aside from a few exceptions such as rates, is ordered and paid via a Purchase Order (PO). The applicable contract terms policy applies to any NHS organisation and states that where an NHS body issues a PO the standard NHS Terms & Conditions apply.

7.2 Section 10 (Warranties) of those standard NHS terms and conditions state the following:

**10 Warranties**

**10.1 The Supplier warrants and undertakes that:**

**10.1.21** it shall: (i) comply with all relevant Law and Guidance and shall use Good Industry Practice to ensure that there is no slavery or human trafficking in its supply chains; and (ii) notify the Authority immediately if it becomes aware of any actual or suspected incidents of slavery or human trafficking in its supply chains;

**10.1.22** it shall at all times conduct its business in a manner that is consistent with any anti-slavery Policy of the Authority and shall provide to the Authority any reports or other information that the Authority may request as evidence of the Supplier's compliance with this Clause 10.1.22 and/or as may be requested or otherwise required by the Authority in accordance with its anti-slavery Policy;

7.3 As part of the procurement process HNYPC will check and review specifications to ensure they include a commitment from suppliers to support the requirements of the act and ensure no contracts are awarded where suppliers do not demonstrate their commitment to ensuring that slavery and human trafficking are not taking place in their own business and/or supply chains.

7.4 HNYPC will create a modern slavery risk register that will capture any key risks from its risk assessments and assign responsible owners to oversee the register.

7.5 The new government modern slavery policy, published in April 2021, mandated that all procurements must consider modern slavery risks throughout a contract life cycle. All new procurements must include a modern slavery risk assessment rating, and, if there is a requirement that is deemed to be high risk, the supplier must undertake an MSAT assessment. All HNYPC procurement activity will now adhere to these requirements.

## **8. Training and Awareness Raising**

8.1 All relevant staff are required to complete the CIPS Ethical Procurement and Supply eLearning and test. Through 3 topics (environmental procurement; fraud, bribery and corruption; human rights) the eLearning raise awareness of how more sustainable and ethical outcomes can be achieved through ethical procurement. HNYPC will track how many procurement staff have completed this training.

8.2 All Trusts provide mandatory training to all staff on modern slavery via the following courses/eLearning packages:

- Safeguarding Adults.
- Safeguarding Children.

8.3 In addition to the mandatory training, staff can also choose to enrol on the following courses/eLearning packages:

- Modern Slavery and Human Trafficking.

- Introduction to Migration.
- Children Vulnerable to Abuse and Exploitation.

8.4 Modern Slavery is also embedded into other relevant training programmes including Recruitment and Selection.

## 9. Working with our Partners

9.1 NHS Supply Chain is the NHS primary supplier of medical equipment and consumables and are overseen by the management function Supply Chain Coordination Limited (SCCL). SCCL in conjunction with the Category Tower Service Providers (CTSPs) are undertaking a Modern Slavery Assessment Programme.

9.2 This programme complements the government's programme of work, which is well underway – with departments such as the Home Office, HMRC and the Department for Business, Energy and Industrial Strategy (BEIS) and demonstrates both the government's commitment to the issue and the key role that public procurement can play in tackling modern slavery.

9.3 Aims of the programme:

- **More transparency will be required of suppliers and their supply chains**  
Modern slavery will become part of supplier performance and suppliers will be expected to work collaboratively on this issue with CTSPs to drive improvements.
- **Creation of a Modern Slavery Assessment Tool**  
The tool itself is a risk identification and management tool that will help CTSPs work in partnership with suppliers to reduce the risk of exploitation of workers in supply chains and help to drive improvement and remediation.

9.4 For non-medical equipment and consumable contracts HNYPC utilise framework agreements established by Crown Commercial Services (CCS). In 2019, CCS carried out a detailed risk assessment of all its commercial agreements. The risk assessment categorised 26 commercial frameworks as having a high or medium risk of modern slavery.

9.5 All suppliers of these frameworks were invited to complete the cross-government Modern Slavery Assessment Tool (MSAT). CCS have discussed results with suppliers and continue to monitor the implementation of the recommendations.

## 10. Priorities for 2025/26

10.1 HNYPC is committed to delivering the following priorities:

- Work closely with other public sector partners across Humber & North Yorkshire to deliver a coordinated approach that shares best practice and increases overall awareness.
- Continually review our procurement processes to ensure that the HNYPC is meeting its commitment to eradicating modern slavery in its supply chains.
- Work with NHS Supply Chain to explore the adoption of the Modern Slavery Assessment Tool.
- Ensure all procurement staff complete mandatory training.
- Ensure all applicable procurement staff complete the Chartered Institute of Procurement and Supply Ethical Procurement and Supply e-learning and test.
- Invite major suppliers in high-risk areas to complete the Modern Slavery Assessment Tool.

- Establish a risk register of high-risk contracts and manage the risk.
- Establish a register of supplier self-declaration of compliance against the Modern Slavery Act 2015.

## **11. Publishing the Statement, Governance & Review**

- 11.1 The HNYPC Modern Slavery & Human Trafficking Statement will be published on the HNYPC and NHS Humber Healthcare Partnership websites.
- 11.2 The statement will be reviewed annually with the next review March 2026.
- 11.3 The three Trust Boards have considered and approved this statement and will continue to support the requirements of the legislation.