

Modern Slavery Act 2015 - Annual statement 2023/24

1. Introduction

This Statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that University Hospitals Sussex NHS Foundation Trust (the Trust or UHSussex) has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain.

There are many definitions of “modern slavery”. Transparency International defines it as **when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom.** This includes but is not limited to human trafficking, forced labour and debt bondage.

It involves the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, 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 or even organ harvesting.

It is easy to think that modern slavery is a problem in other parts of the world and “doesn’t happen here”. But official figures suggest around 10,000 people in the UK are victims; slavery experts believe the number is more like 100,000. In 2022, almost 17,000 potential victims of modern slavery were referred to the UK’s National Referral Mechanism (NRM), representing a 33 per cent increase on the previous year and the highest number of referrals since the NRM began in 2009.

The NHS buys a wide range of goods and services, and some of the relevant sectors are certainly vulnerable to modern slavery. For example, there have been prosecutions in the UK in recent years relating to firms producing beds, garments and food products – all major spend areas for many NHS Trusts.

The Trust has a zero-tolerance approach to any form of modern slavery or human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

2. About the Organisation

UHSussex is one of the largest organisations in the NHS. We employ nearly 22,000 staff, serve a population of around 1.8 million people and have an annual operating budget of over £1.3 billion. University Hospitals Sussex NHS Foundation Trust was formed on 1 April 2021 by the merger of Western Sussex Hospitals NHS Foundation Trust (WSHFT) and Brighton and Sussex University Hospitals NHS Trust (BSUH)

The Trust provides all district general hospital services for Brighton and Hove, West and Mid Sussex and parts of East Sussex. We also provide specialist services for patients from across the wider South East. These include neuroscience, arterial vascular surgery, neonatology, and specialised paediatric, cardiac, cancer, renal, infectious disease and HIV medicine services.

We also provide services at GP surgeries, health clinics and other hospitals.

The Trust runs seven hospitals in Brighton and West Sussex:

Our Royal Sussex County, Worthing, St Richard's and Princess Royal hospitals all have 24-hour accident and emergency units. Maternity services are available at all four hospitals. The County is also our centre for major trauma and tertiary specialist services. We provide children's services at the Royal Alexandra, St Richard's and Worthing hospitals. Eye care is based at the Sussex Eye Hospital and at Southlands, which also specialises in day-case procedures, diagnostics and outpatient clinics.

3. Our commitments against slavery and human trafficking

University Hospitals Sussex NHS Foundation Trust is aware of its responsibilities towards patients, service users, employees, suppliers and the local community and expects all staff and suppliers to the Trust to adhere to the same ethical principles, including in terms of modern slavery.

The Trust aims to follow good practice and take all reasonable steps to prevent slavery and human trafficking. We are committed to ensuring that all of our employees are aware of the Modern Slavery Act 2015 and their safeguarding duty to protect and prevent any further harm and abuse when it is identified or suspected that any individual may be or is at risk.

The Trust fully supports the government's objective to eradicate modern slavery and human trafficking and we acknowledge our role in both combating it and supporting victims. The Trust is committed to ensuring our supply chains and our business activities are free from ethical and labour standards abuse.

UHSussex is committed to working with local partners to improve our practice and to raise awareness, disrupt and respond to modern slavery wherever possible.

4. Arrangements to prevent slavery and human trafficking

The Trust is committed to ensuring there is no modern slavery or human trafficking in our organisation, our supply chains or any part of our business activity. Our approach forms a key element of our wider commitment to social and environmental responsibility and modern slavery policy also forms part of our safeguarding strategy and arrangements.

Our approach includes internal policies to ensure that we are conducting business in an ethical and transparent manner. They include the following:

Recruitment policies: We operate a robust recruitment policy including conducting eligibility to work in the UK checks for all directly employed staff. External agencies are sourced through NHS nationally approved frameworks and are audited to provide assurance that pre-employment clearance has been obtained for agency staff to safeguard against human trafficking or individuals being forced to work against their will.

Safeguarding Policies: The Trust is committed to ensuring adherence to the principles set out within both our Safeguarding Children & Young People and Safeguarding Adults policies. These provide clear guidance so that our employees are aware how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.

Freedom to Speak Up Policy: We operate a Freedom to Speak Up policy, so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals. This supports The Public Interest Disclosure Act 1998 (PIDA), which 'protects whistleblowers from detrimental treatment by their employer as a result of making a public interest disclosure.

Associated arrangements

New arrangements to support raising concerns via the Freedom To Speak Up process also support good practice and protect workforce rights further. The Trust is also ensuring appropriate mechanisms to regularly review and monitor progress on promoting and supporting equality, diversity and inclusion within UHSussex. To ensure Equal Opportunities we have a range of controls to protect staff from poor treatment or exploitation and we comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.

Training and promotion

Our online safeguarding training courses include role-relevant modern slavery awareness and are part of mandatory training for all staff,. The Trust promotes awareness of modern slavery through e-learning via the relevant on-line platform and UHSussex's intranet pages for staff provides further support and resources on modern slavery and human trafficking.

5. Our approach to procurement and our supply chain:

UHSussex has a zero-tolerance approach to any form of modern slavery and is committed to acting ethically and with integrity and transparency in all business dealings. The Modern Slavery Act 2015 places responsibility for organisations to act in order to reduce the chance of modern slavery taking place in their supply chains.

The Trust is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Trust is aware of its responsibilities towards patients, service users, employees and the local community and expects all suppliers to adhere to the same ethical principles.

Our procurement approach follows the Cabinet Office Procurement Policy Note 02/23: 'Tackling Modern Slavery in Government Supply Chains' to identify and manage risks in both new procurement activity and existing contracts. Steps include:

- *Pre-procurement and specification:* identify the risks in the particular spend area to establish if modern slavery issues should be factored into the specification, supplier selection and contract management processes, ensuring that the approach taken is proportionate based on the risks identified. Identify high-risk contracts
- *Selection stage:* consider the mandatory and discretionary exclusion grounds as set out in the Standard Selection Questionnaire, and if these can be supplemented with additional questions for medium / high risk contracts, whilst not creating barriers to participation by smaller firms.
- *Award stage:* where appropriate, apply the standard criteria in the Social Value Model, ensuring these sufficiently take account of the risk of modern slavery and any specification requirements, whilst taking a proportionate approach.

- *Contract conditions:* apply NHS Standard Terms and Conditions which contain clauses placing obligations on the supplier regarding Good Industry Practice and ensuring commitment to anti-slavery and human trafficking in the supplier's business and own supply chains.
- *Contract management:* following contract award, continually work in collaboration with suppliers to monitor and address modern slavery risks, including a clear process for reporting and responding to suspected incidents of modern slavery.

6. **Our indicators of performance**

We will gain assurance on the effectiveness of the steps that we are taking, to ensure that slavery and/or human trafficking is not taking place within our business or supply chain. The absence of reports from staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified is one positive indicator. Where appropriate, we will take more proactive steps, working with other NHS or cross-government bodies where appropriate, to provide additional assurance. That could include third-party audits, site visits or targeted interventions with specific suppliers.

7. **What you should do**

If you suspect someone could be a victim of modern slavery, in our own organisation or in our supply chain, contact Sussex Police on 999 if there is an immediate risk, via 101 (be clear that your concern is about modern slavery) or through the [Sussex Police website](#).

Alternatively, you can call the Modern Slavery Helpline on 08000 121 700, Crime Stoppers on 0800 555 111 or the Salvation Army confidential hotline on 0800 808 3733.