University Hospitals Sussex
NHS Foundation Trust

Modern Slavery Act 2015 - Annual statement 2026/27

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.

Modern slavery is a human rights violation and has severe consequences for the health and wellbeing of survivors. It is an exploitative crime that impacts on physical and mental health and has public health implications.

The term Modern Slavery captures a whole range of types of exploitation, many of which occur together. These include but are not limited to: forced labour, human trafficking, debt bondage, domestic servitude, forced labour and criminal exploitation including organ harvesting.

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 are trafficked for a number of reasons.

Modern Slavery is an international crime which is often hidden, affecting an estimated 29.8 million people around the world. It is a global concern that transcends age, gender and ethnicity. It is something that is still happening today, and it happens here in the UK

In the UK, referrals into the National Referral Mechanism (NRM) continue to increase year on year, reflecting improved awareness and identification of potential victims of modern slavery. A total of 23,411 potential victims of modern slavery were referred to the Home Office (HO) in 2025, representing a 22% increase compared to the preceding year (19,117). The number of referrals made in 2025 is the highest in any year since the NRM began in 2009, overtaking the record from the previous year (2024)

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.

UHSussex actively works to combat modern slavery within its supply chains and business activities in line with the Health and Care Act 2022. This involves our due diligence to assess the risks of modern slavery through our procurement processes which requires supplier to take reasonable adjustments to mitigate these risks.

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 over 24,000 staff, serve a population of around 1.8 million people and have an annual operating budget of over £1.6 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 across Brighton & Hove 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 UH Sussex'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 009: 'Tackling Modern Slavery in Government Supply Chains' to identify and manage risks in both new procurement activity and existing contracts. Steps include:

- *Procurement planning / 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
- *Exclusions*: consider verification processes to ensure there are no offences or evidence of modern slavery which would give rise for exclusion. If a procurement has been assessed as high risk, supplier information details and exclusion information from all supply chains should be requested via the Central Digital Platform and Procurement Specific Questionnaire.
- *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.
- *Tender assessment and award*: Section 23 of the Procurement Act, requires that when setting award criteria (including any social value award criteria), an in-scope organisation must be satisfied that they relate to the subject-matter of the contract; are sufficiently clear, measurable and specific; do not break the rules on technical specifications in section 56, and are a proportionate means of assessing tenders, having regard to the nature, complexity and cost of the contract. If the risk of modern slavery is assessed as low or medium following the CoP

Commented [BC1]: I was suggesting this wording to provide assurance that we are now in alignment and have embedded the procurement policies that came in 2004 - "Our procurement approach reflects full alignment with the Procurement Act 2023 (implemented October 2024), alongside the Cabinet Office Procurement Policy Note 009: 'Tackling Modern Slavery in Government Supply Chains' to identify and manage risks in both new procurement activity and existing contracts".

assessment, or the sector is immature at dealing with modern slavery risks, in-scope organisations may have decided to rely on the modern slavery criteria included in the Social Value Model, noting section 23 as above.

- *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.
- *Monitoring:* For contracts where the risk of modern slavery is high, in-scope organisations can include information relating to modern slavery issues to the contract. Suppliers should also be asked to provide assurance on the processes in place to identify and address modern slavery risks in their supply chains through regular contract management meetings where the supplier can provide detailed updates on how they are meeting legislative and contractual requirements including, where relevant, assurance of legal compliance with the Modern Slavery Act and the production of a high quality modern slavery statement in line with Home Office guidance.

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 substantiated cases of modern slavery identified within the Trust's workforce or direct supply chains, alongside the absence of reports from staff, the public or law enforcement agencies, 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.