

Modern Slavery and Human Trafficking Act 2015 Policy Statement 2025-2026

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

This statement sets out actions taken by Somerset NHS Foundation Trust, and continue to take, to understand all potential modern slavery and human trafficking risks and to implement effective systems and controls.

The Trust continues to fully support 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.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Somerset NHS Foundation Trust has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the Trust or our supply chain.

We are committed to improving our practices to combat slavery and human trafficking. We are fully aware of our responsibilities towards patients, employees and the local community. We have robust ethical values which we use as guidance for our commercial activities. We also expect all suppliers to the Trust to follow the same ethical principles.

Policy on Slavery and Human Trafficking

We are committed to ensuring there is no modern slavery or human trafficking in any part of our business and, in addition require that our suppliers hold similar ethos.

Currently, all suppliers awarded a contract under the NHS Terms and Conditions for either supply of goods or provision of services are contracted under the relevant clause for modern slavery and human trafficking. Similar terms and conditions are also included by the national framework providers. For high-risk contracts, additional specific clauses can be included to strengthen contractual protection. Good Industry Practice including tackling modern slavery in supply chains ensures both Trust and suppliers commitment to anti-slavery and human trafficking; and that they conduct their businesses in a manner that is consistent with the Trust's stance on anti-slavery. In addition, an increasing number of suppliers are implementing the Labour Standards Assurance System (LSAS) as a condition of contract for tenders within high-risk sectors and product categories and indeed this has been referenced in the Government's Modern Slavery Strategy. Many aspects of the LSAS align to the seven reporting areas that the Government has outlined and should appear within any slavery and human trafficking statement.

We operate a number of internal policies which ensure we are conducting business in an ethical and transparent manner. These include:

Recruitment - we operate a robust recruitment policy, including conducting eligibility to work in the United Kingdom checks for all directly employed staff. Agencies on approved frameworks are audited to provide assurance that preemployment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will.

Equal Opportunities - we have a range of controls to protect staff from poor treatment and/or exploitation, which complies with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and fair access to training and development opportunities.

Safeguarding - we adhere to the principles inherent within both our safeguarding unborn babies and children and adults' policies. These are compliant with the relevant legislation, the Somerset Safeguarding Adult Board and Somerset Children's Safety Partnership multiagency agreements and provide clear guidance so that our employees are clear on how to raise safeguarding concerns.

Freedom to Speak Up - we operate a Freedom to Speak Up policy so that everyone in our employment knows 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, and the various ways in which they can raise their concerns.

Standards of business conduct – the Trust's Code of Conduct and Managing Conflicts of Interest Policy clarifies the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

We follow employment checks and standards which include the right to work and depend on receiving suitable references.

We are committed to social and environmental responsibility and have zero tolerance of modern slavery and human trafficking. Any identified concerns regarding modern slavery and human trafficking would be escalated as part of the organisational safeguarding processes in conjunction with partner agencies.

We will:

- comply with legislation and regulatory requirements.
- ensure suppliers and service providers are aware we promote the requirements of the legislation.



- develop awareness of modern slavery issues.
- include modern slavery conditions or criteria in specifications and tender documents within the supplementary terms and conditions.
- encourage suppliers and contractors to take their own action and understand their obligations about these new requirements.
- expect supply chain/framework providers to demonstrate compliance with their obligations in their processes.

Our approach to procurement and our supply chains

Trust staff must contact and work with the procurement departments when looking to work with new suppliers so appropriate checks can be undertaken.

Procurement staff will ensure due diligence by:

- checking draft specifications include a commitment from suppliers to support the requirements of the Act.
- not awarding contracts where suppliers do not demonstrate their commitment to ensuring slavery and human trafficking are not taking place in their own business or supply chains.
- communicating clear expectations to our suppliers through a supplier code of conduct.
- monitoring compliance by suppliers with the requirements of the Act.

Training

Advice and training about modern slavery and human trafficking is available to staff through our mandatory safeguarding children and adults training programmes, our safeguarding policies and procedures, and our safeguarding leads. It is also discussed at our corporate induction training which is mandatory for all our new starters. We are looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

Our Performance Indicators

We will know 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 if there are no reports from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

This statement has been approved by the Trust's Board of Directors who will continue to support the requirements of this legislation. The Board will aim to review and update it on an annual basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2026.

Signed on behalf of the Board of Directors



Dr Rima Makarem
Chair



Peter Lewis
Chief Executive

Date: 4 March 2025

