

**Trust Board of Directors
Report Summary**

Date of Meeting: 7 May 2026	
Title of Document: Modern Slavery Statement	
To be presented by: Kate Read, Director of People and Organisational Development	Author: Clare Harper, Business Manager, HR/OD
1. Status: For Approval	
2. Purpose: To review the Trust's statement prior to inclusion in the Annual Report 2025/26	
Relates to:	
Strategic Objective	<p>Include the relevant objective/all –</p> <ul style="list-style-type: none"> • Improving health: not just treating illness, moving from treatment to prevention. • Joined up care: integration and community-based delivery. • Excellent care: improved outcomes, increasing personalisation and co-production. • Developing staff: supporting our teams and building for the future. • Using technology to improve care: digital, technology and innovation – shifting from analogue to digital care.
Operational performance	N/A
Quality and equality impact	All staff are subject to the mandatory training requirements in relation to equality, diversity and inclusion which includes a section on modern slavery.
Legal/Regulatory/Audit	<p>Meeting the requirements of the Modern Slavery Act 2015; a voluntary disclosure for inclusion in the Annual Report, NHS England NHS foundation trust annual reporting manual 2025/26.</p> <p>To demonstrate compliance with the minimum legal requirements, statements require update on an annual basis and the assessment should be done within six months of the financial year-end and include the date of Board approval</p> <p>https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement</p>
Finance	None included in this report
Governance	As above
NHS policy/public consultation	Confirmation of the steps taken by the Trust to prevent modern slavery in its supply chains are provided in this report.
Accreditation/inspection	N/A
Anchor institutions	The Trust takes its responsibility as a key anchor organisation in the local communities that it serves, and the wider national part that it

	plays as an NHS public sector provider. Our key principles on how we comply with legislation and regulatory requirements are included in this report.
ICS/ICB/Alliance	As above
Board Assurance Framework (BAF) Risk	
Other	

3. Summary:

One of the voluntary disclosures suggested for inclusion in the Trust's Annual Report is a Modern Slavery Act and Human Trafficking Statement.

The Modern Slavery Act 2015 established a duty for commercial organisations to prepare an annual slavery and human trafficking statement. This is a statement of 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 or in any part of its own business.

An entity is a 'commercial organisation' for the purposes of the Act if it supplies goods and services and has an annual turnover in excess of £36 million (set out in The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015). Additionally, it must be a body corporate or partnership which carries on a business, or part of a business, in any part of the United Kingdom.

Where a slavery and human trafficking statement is required, the Act specifies that entities must publish this on their website if they have one. NHS England does not require NHS foundation trusts to include the slavery and human trafficking statement in their annual report (where the Act requires one be produced) but foundation trusts may include it in the annual report if they wish.

A full review of the statement has been undertaken involving both procurement and safeguarding colleagues.

4. Recommendations / Actions

The Board is invited to approve the revised statement.

Modern Slavery Act 2015 and Human Trafficking Statement

East Suffolk and North Essex NHS Foundation Trust (ESNEFT) aims to deliver high-quality services for all, and we do this by ensuring that our workforce has the right numbers, skills, values and behaviours to support the delivery of excellent healthcare and health improvement to patients and the public.

The Trust is committed to utilising the funding it receives to provide healthcare to our local communities in an efficient, effective and responsible way and enables vital supplies to be delivered to the organisation without disruption, so that frontline staff can focus on providing world-class patient care.

ESNEFT fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role that NHS organisations must play in both mitigating it and supporting victims. This includes a commitment to ensure our supply chains and business activities are free from ethical and labour standards abuse.

As part of our commitment to eradicate modern slavery and human trafficking we will ensure that our:

➤ **Due Diligence Process:**

○ **Complies with legislation and regulatory requirements in this area**

The Cabinet Office issued a directive on Modern Slavery in 2015, and Procurement has always referenced the legislation in our tender and contracting documentation. This was later followed with Cabinet Office Procurement Policy Notes - PPN 05_19 and more recently PPN02_23.

The NHS Evergreen Sustainable Supplier Assessment, launched in June 2023 and embedded within Atamis, the NHS-wide e-commerce platform, enables NHS suppliers to share their progress against the NHS [Net Zero Supplier Roadmap](#) published in 2021. The Evergreen Assessment requires action on modern slavery to progress through the maturity levels of the assessment.

○ **Make suppliers and service providers aware that we promote the requirements of this legislation**

Procurement makes suppliers aware of this legislation through the tender and contracting documentation we use when undertaking procurement tender exercises. We are currently reviewing the new guidance to cross-reference with our current processes and documentation. With regard to NHS terms and conditions these are 'owned' by NHS England so will reflect the new guidance with amendments made as required.

○ **Considers modern slavery factors when making procurement decisions**

The shortlisting and selection process to identify suppliers to participate in a tender exercise includes Modern Slavery criteria. When accessing framework agreements this will be the same for the organisation that 'owns' the framework.

○ **Use NHS Terms and Conditions for Goods and Services for specification and tender documents which require suppliers to comply with all relevant legislation and guidance, including modern slavery conditions**

NHS terms and conditions are owned by NHS England and are updated accordingly.

➤ **Risk Assessment, Management and Effectiveness:**

- **Encourages suppliers and contractors to take their own actions and understand their obligations under this legislation**
Our tender documentation and contracts cover this, and evidence is requested in support of the criteria.
- **Develops awareness of modern slavery issues throughout ESNEFT**
Procurement staff have completed government training via the Cabinet Office. Procurement promotes the Modern Slavery Act by publishing the Procurement Policy Notes on the Procurement intranet page. In addition, the procurement newsletter is used to promote the Act to staff that frequently participate in tender and contracting projects and processes. The Trusts' standard tender and contracting documentation also includes supplier compliance within the selection criteria relating to the Modern Slavery Act.
- **Ensures that procurement staff also receive regular legal briefings and appropriate training so that they are aware of legislative requirements in this area**
Procurement staff receive regular briefings. This includes the Cabinet Office training and the training webinars that Mills and Reeve legal practice provides. This also forms part of the Chartered Institute of Purchasing and Supply (CIPS) qualifications

➤ **Policies in relation to modern slavery and human trafficking:**

- **Ensure that all staff adhere to internal policies that support our commitment to eradicating modern slavery and are equipped to appropriately support when victims present. These include:**
 - Freedom to Speak Up policy
 - Safeguarding Adults policy
 - Safeguarding Referral Guide
 - Sexual Safety in Healthcare organisational charter
 - Safe Workplace – Tackling Sexual Harassment in the Workplace Guide
 - Equal Opportunities and Diversity Policy
 - Strategic Framework for NHS Commercial
 - NHS People Promise

➤ **Training**

- **Ensure that modern slavery is included in safeguarding work plans**
Included within Trust's Safeguarding Adults training and in some of our bespoke Safeguarding Children's training. There is also a section in the Equality, Diversity and Human Rights mandatory training.
- **Ensure that all staff undertake mandatory safeguarding training, and training in equality, diversity and human rights**
All staff are subject to the mandatory training requirements of employment within the Trust and compliance is monitored at monthly divisional accountability framework meetings.

Approved by the Board of Directors on: **TBC**