

UNIVERSITY HOSPITALS OF MORECAMBE BAY NHS FOUNDATION TRUST

Modern Slavery and Human Trafficking Statement 2025/26

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps University Hospitals of Morecambe Bay NHS Foundation Trust ("the Trust") has taken during the 2025/26 financial year to prevent modern slavery and human trafficking within our organisation and supply chains.

The Trust fully supports the Government's objective to eradicate modern slavery and human trafficking and recognises the significant role the NHS has in both preventing and identifying exploitation. We remain strongly committed to ensuring that our supply chains, workforce practices, and operational activities are free from labour standards abuses and align with ethical and human rights principles.

Our Organisation and Structure

We are a university teaching hospital providing community and hospital services across the Morecambe Bay area, covering over a thousand square miles across south Cumbria and north Lancashire. Our main hospital sites include:

- Furness General Hospital (Barrow).
- Royal Lancaster Infirmary (Lancaster).
- Westmorland General Hospital (Kendal).

As well as community facilities such as Millom Hospital, Queen Victoria Hospital (Morecambe), and Ulverston Community Health Centre.

Our Commitment to Combatting Modern Slavery

The Trust is committed to:

- Respecting and protecting the human rights of all employees, workers, and individuals within our supply chain.
- Ensuring that employment is freely chosen and free from coercion.
- Promoting equality, diversity and inclusion in all workplaces.
- Ensuring working environments are safe, healthy, and free from discrimination.
- Ensuring no individual is subjected to forced labour or human trafficking.
- We expect all suppliers and partners to adhere to the same high standards and to demonstrate compliance with the Modern Slavery Act.

Policies Relevant to Modern Slavery

Modern slavery considerations are embedded within several Trust policies, including:

- Safeguarding Adults at Risk Policy.
- Safeguarding Children Policy.
- Freedom to Speak Up / Raising Concerns Policy.
- Procurement Policy.
- Early Resolution (Behaviours at Work) Policy.
- Equality, Diversity and Inclusion policies.
- Modern slavery is included within both our safeguarding policies and mandatory training for staff and is supported through local and regional safeguarding board guidance.
- Our Freedom to Speak Up Guardian and safeguarding teams ensure staff have confidential channels to raise concerns related to exploitation, unsafe working practices, or trafficking indicators.

Recruitment and Employment Practices

We maintain robust recruitment and employment processes to safeguard against modern slavery, including:

- Verification of identity and legal right to work in the UK.
- Full DBS and employment checks in line with NHS Employment Check Standards.
- Use of approved frameworks for recruitment of temporary workers only.
- Compliance with national NHS pay, terms and conditions (assuring lawful remuneration).
- All employment with the Trust is voluntary, and our policies ensure workplaces are safe and free from harassment or discrimination.

Our Supply Chains and Procurement Standards

A significant proportion of our goods and services are procured through national government frameworks including NHS Supply Chain and Crown Commercial Services. Procurement activity is undertaken:

- In line with UK legislation and NHS commercial standards.
- Embedding social value and modern slavery considerations into all procurements.
- Requiring suppliers to confirm compliance with the Modern Slavery Act.
- Using a Supplier Code of Conduct that suppliers must adhere to.
- Procurement staff complete training through the Government Commercial College, with Chartered Institute of Procurement and Supply (CIPS) members completing annual ethical procurement training.

The Trust has reviewed its supply chain and engaged suppliers in higher-risk areas including food, construction, cleaning, and workwear clothing to confirm their compliance.

Due Diligence and Risk Management

To identify and mitigate risk, the Trust:

- Reviews all procurement processes for compliance with modern slavery standards.
- Requests compliance evidence from suppliers.
- Incorporates modern slavery questions into tendering processes.
- Works collaboratively with NHS Supply Chain and Crown Commercial Services to support system-wide initiatives.
- Conducts ongoing monitoring of higher-risk suppliers and categories.
- We recognise that not identifying risks may indicate insufficient due diligence and remain committed to transparency and continuous improvement.

Training and Awareness

Modern slavery and human trafficking training is provided through:

- Mandatory safeguarding adults and children training.
- Trust-wide communications and awareness campaigns.
- Specialist safeguarding training delivered by the safeguarding team.
- Multi-agency countywide safeguarding guidance and referral processes.
- This ensures staff are equipped to recognise and respond to potential cases of exploitation.

Measuring Effectiveness

During 2026/27, the Trust will continue to focus on:

- Embedding social value and modern slavery standards into all commercial activity.
- Ensuring staff have continued access to up-to-date training.
- Enhancing supply chain visibility, particularly in higher-risk categories.
- Impact-assessing new or revised policies for equality, diversity, and inclusion.
- Supporting staff to identify, report and respond to concerns promptly.
- The Trust Board will continue to oversee compliance and the effectiveness of these measures.

Approval for this Statement

The Board of Directors has considered and approved the Modern Slavery statement for the financial year 1 April 2025 to 31 March 2026, as part of the Annual Report and Accounts 2025/26, and will continue to support the requirements of the legislation.

Government Modern Slavery Statement Registry

This registry has been launched by the Home Office to enable easier access Modern Slavery Statements. Following approval of the Trust's Modern Slavery Statement for 2025/26, this will be added to the registry as well as being available on the Trust's website.

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