

MODERN SLAVERY AND HUMAN TRAFFICKING ACT 2015
ANNUAL STATEMENT FOR FINANCIAL YEAR ENDED 31 MARCH 2026
(Published in accordance with Section 54(1) of the Modern Slavery Act 2015)

This statement sets out the actions taken by South Tyneside and Sunderland NHS Foundation Trust (“the Trust”) during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking in our organisation and across our supply chains. The Modern Slavery Act requires organisations meeting the statutory threshold to publish an annual statement detailing steps taken to address modern slavery risks.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Trust maintains a zero-tolerance stance and is committed to ensuring all business activities are conducted ethically, transparently, and with integrity

1. About the Trust

We provide acute and community healthcare services to a core population of over 430,000 people living in and around the borough of South Tyneside and the City of Sunderland. We also provide a number of community and other services to the Gateshead population as well as a range of specialist services accessed by patients across the whole of the North East and beyond, serving a population of almost 1 million people.

As at the end of March 2026, the Trust employed 8,726 members of staff, has just over 1,000 acute beds, an annual income of £849.832m and fixed assets of £282.138m.

Our vision is to deliver “**excellence in all that we do**” and how we do this is set out in our 5 year strategic framework. Both our vision and strategic framework are supported by the organisation’s values:

- Compassion – we are kind and caring;
- Honesty – we are open and honest;
- Respect – we treat people fairly and with respect; and
- Teamwork – we work as a team.

We work closely with a range of partners including primary care, local authorities, North East and North Cumbria Integrated Care Board, NHS England, the independent sector, colleges, universities, and voluntary organisations to deliver care to our communities.

2. Procurement and our Supply Chain and its Due Diligence

The Trust’s procurement activity is delivered by City Hospitals Independent Commercial Enterprises Ltd (Choice), a wholly owned subsidiary of the Trust. Choice has published a separate Modern Slavery Statement outlining its own commitments and actions to prevent modern slavery and human trafficking within its operations and supply chain. This can be accessed using the link below:

[Choice Modern Slavery Statement 2026](#)

A large proportion of NHS procurement is managed through frameworks with NHS Supply Chain, owned by NHS England, its principal activity is to source, deliver and supply healthcare products, services and food for NHS organisations across England. It manages more than 8 million orders per year, resulting in over 28 million lines of picked goods distributed to the NHS annually, across a catalogue of up to 600,000 products. High-risk goods such as personal protective equipment (PPE), consumables, and electronics remain a focus of national due diligence efforts.

NHS England maintains a group statement for NHS bodies and continues to update guidance on tackling modern slavery in NHS procurement. This statement is available through the link below:

[NHS England » NHS England modern slavery and human trafficking statement for 2025/26](#)

NHS Supply Chain's commitment to tackling modern slavery is available on its website using the link below:

[Tackling modern slavery together: how NHS Supply Chain provides assurance to the health and care system - NHS Supply Chain.](#)

NHS England guidance emphasises the importance of consistent, system-wide risk management and advocates the use of pre-assured, centrally managed procurement routes wherever possible. NHS England accredited frameworks undergo rigorous due diligence and commercial oversight, helping ensure that suppliers meet required ethical, governance and social-value standards, including those related to modern slavery. Accordingly, we:

- prioritise the use of NHS England-accredited or endorsed frameworks as our primary route to market; and
- use alternatives only where no suitable framework exists and where there is a clearly justified operational requirement.

Throughout the entire commercial life cycle, procurement design, market engagement, tender evaluation, contract award and ongoing contract management, we ensure modern slavery risks are identified, assessed and appropriately managed. This includes:

- applying a standardised modern slavery risk-assessment methodology (via Atamis) across all procurements to ensure consistent risk identification and proportionate mitigations;
- taking reasonable and proportionate steps based on the level of modern slavery risk identified;
- requiring completion of the Modern Slavery Assessment Tool (MSAT): as a condition of participation for all high-risk procurements; within three months of contract award for all medium-risk procurements;
- ensuring that all suppliers in scope of the Modern Slavery Act 2015 provide a compliant and up-to-date Modern Slavery Statement as a condition of participation;
- using standard NHS terms and conditions as the contractual baseline. Where these are not used, we ensure that all contracts contain robust, modern-slavery-specific clauses; and
- embedding modern slavery KPIs into medium and high-risk contracts and monitoring compliance through scheduled contract management reviews.

3. Organisational Policies Supporting Prevention of Modern Slavery

The Trust maintains a range of policies to identify, prevent, and address modern slavery risks, including:

Recruitment Policies

- Criminal Background and Disclosure and Barring Service Policy
- Employment Checks Policy
- Recruitment and Selection Policy
- Secondary Employment Policy
- Locum Doctor and Other Agency Workers Policy
- Equality, Diversity and Inclusion Policy

Raising Concerns Policies

- Freedom to Speak Up / Whistleblowing Policy
- Incident Reporting, Management and Learning Policy
- Counter Fraud, Bribery and Corruption Policy

Safeguarding Policies

- Safeguarding Adults Policy
- Safeguarding and Cared for Children Policy
- Mental Capacity Act and Deprivation of Liberty Safeguards Policy
- Safeguarding Supervision for Healthcare Professionals Policy

The Trust's Safeguarding policies and training reflects updated regulations in relation to the Human Tissue Act 2004. These regulations place a statutory duty on all relevant clinicians in England, Wales and Northern Ireland to report the following information to the Human Tissue Authority:

- a) if they suspect that an organ transplant-related offence under the Human Tissue Act 2004 or Modern Slavery Act 2015 may have been committed; or
- b) if they are made aware that a patient has received an organ transplant outside the UK.

Procurement Policies

- Control of Contractors Policy (Choice policy)

4. Training on Modern Slavery and Human Trafficking

All Trust staff have a personal responsibility to safeguard against exploitation.

Modern slavery content is integrated into all levels of mandatory Safeguarding Training, with refresher intervals up to every three years (frequency differs depending upon role).

Recruitment Team staff receive enhanced training tailored to identifying modern slavery indicators.

All members of Choice Procurement Services are required to complete the dedicated e-learning module 'Tackling Modern Slavery in Supply Chains', delivered through the Government

Commercial College. This training strengthens understanding of modern slavery risks, supply-chain vulnerabilities and appropriate mitigation strategies, ensuring staff are equipped to discharge their responsibilities effectively. In addition, staff who hold professional registration with the Chartered Institute of Procurement and Supply (CIPS) undertake the annual CIPS Ethical Procurement and Supply training. This includes a focused module on human rights, covering how to identify signs of modern slavery within supply chains and the appropriate actions to take where concerns arise.

These training requirements ensure our procurement professionals consistently apply best practice, maintain high ethical standards, and remain aligned with national expectations for tackling modern slavery in NHS supply chains.

5. Risk Management and Internal Assurance

The Trust's risk management processes ensure that concerns – whether via incident reports, whistleblowing, safeguarding alerts or line-manager escalation – are investigated and addressed promptly.

Internal Audit has previously reviewed the Trust's Modern Slavery compliance and provided a good level of assurance, with recommendations fully implemented.

6. Priorities for 2026/27

In line with emerging regulatory requirements and updated guidance, the Trust will:

- work with colleagues from Choice to fully implement and embed the requirements of the National Health Service (Procurement, Slavery and Human Trafficking) Regulations across all procurement activity;
- continue staff training and promote awareness;
- work with NHS England and ICB partners to ensure consistent regional approaches; and
- monitor national guidance updates on modern slavery reporting expectations and best practice disclosures

7. Approval of this Statement

This Modern Slavery and Human Trafficking Statement was approved by the Board of Directors on 2 July 2026 and will be published on the Trust's website in accordance with the Modern Slavery Act requirements.

ALLISON THOMPSON
Chair

KEN BREMNER MBE
Chief Executive