

Modern Slavery Act 2015 Section 54

Slavery and Human Trafficking Statement

2025-26

Section 54 of the Modern Slavery Act 2015 requires all organisations to set out 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, and in any part of its own business.

Pennine Care NHS Foundation Trust fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role the NHS has to play in both combating it and supporting victims. In particular, we are strongly committed to ensuring our supply chains and business activities are free from abuses of ethical and labour standards. This statement sets out actions taken by the Trust to understand all potential modern slavery and human trafficking risks and to implement effective systems and controls.

We realise that slavery and human trafficking can occur in many forms, such as forced labour, domestic servitude, sex trafficking and workplace abuse.

The Trust is proud to provide mental health and learning disability services to help improve the lives of people across Greater Manchester.

We serve a population of 1.3 million, and our vision is a happier and more hopeful life for everyone in our communities. More than 4000 dedicated and skilled staff deliver care from around 200 different locations in five boroughs:

- Bury
- Oldham
- Heywood, Middleton and Rochdale
- Tameside and Glossop
- Stockport

Our mental health teams provide care and treatment for people with mild to moderate conditions such as depression, anxiety or dementia, or more serious mental health illnesses such as schizophrenia and bi-polar disorder. We provide psychological therapies, drug and alcohol services, psychiatric intensive care, rehabilitation services and many more.

Our learning disability services are for people with a moderate to profound level of learning disability, such as those with downs syndrome.

People and Policies

We have zero tolerance for slavery and human trafficking and are fully aware of our responsibilities towards our service users, employees and local communities.

- We have a number of policies which support us in conducting business in an ethical manner, including:
 - Recruitment and Selection Policy
 - Safeguarding Families Policy
 - Freedom To Speak Up Policy
 - Early Resolution Policy
 - Conduct and Disciplinary Policy.
- We confirm the identities of all new employees and their right to work in the United Kingdom, and pay all our employees above the National Living Wage.
- We are committed to creating an open, honest and transparent organisation, where workers feel able to speak up and are valued for doing so. Our Freedom to Speak Up Policy provides a platform for our employees to raise concerns about poor working practices. Staff are provided with Freedom to Speak Up information at their corporate induction.
- Modern slavery is incorporated within the Trust Safeguarding Families Policy and is referenced within the Safeguarding mandatory training from Levels 1-3, which applies to all staff employed by the Trust. The Safeguarding Training clearly sets out the level of training appropriate to our colleagues.
- Information about modern slavery and human trafficking is available to all staff on the Trust Intranet via the Safeguarding page.
- Advice and support regarding modern slavery concerns continues to be available to all staff from via our safeguarding team.

Procurement and our Supply Chain

PCFT procures goods and services on behalf of Trust clients and service users whilst upholding both value for money and ethical values. The Trust is fully aware of its responsibility towards its customers, employees and the communities it serves. Thus, the Trust has created a strict set of ethical values to guide employees/suppliers in its business dealings. The MIAA¹ audits all procurement activity within the Trust.

In addition to its duties under section 54 of the Modern Slavery Act 2015, the Trust has regard to the requirements of the *National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025*. These Regulations reinforce the NHS's responsibility to identify and address risks of modern slavery and human trafficking within procurement and supply chain activity. The Trust is embedding proportionate, risk-based modern slavery considerations into its procurement and contract management processes, in line with these Regulations.

The Trust expects all suppliers, i.e., all companies who do business with PCFT, to adhere to these ethical principles. For this purpose, the Trust has produced a Supplier Code of Conduct, which sets the standards for doing business with PCFT.

¹ [Miaa](#)

The Trust reserves the rights to carry out due diligence and request documentary evidence of suppliers supply chain auditing processes.

The Trust will endeavour to implement this mandatory code of conduct to all new and existing suppliers through the publication of this statement, making it a fundamental requirement of all future tendering and quotation processes. Through the use of the PCFT supplier code of conduct the Trust will seek to mitigate the risk involved in procuring goods and services from supply chains which may have been affected by the practices stated below.

The supplier shall comply with all laws applicable to its business, including, but not limited to, the Human Rights Act 1998 and the Modern Slavery Act 2015. The supplier should support the principles of the United Nations' Global Compact, UN Universal Declaration of Human rights, as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

Effective action taken to address modern slavery and human trafficking

- A Freedom to Speak Up Report is submitted to the Board of Directors on a quarterly basis which includes an overview of the number of concerns raised by staff and the category that they fall into.
- The Head of Safeguarding attended "Starting with the survivor: Tackling modern slavery and human trafficking" for Greater Manchester in October 2025 and fed learning back into the organisation.
- Any modern slavery concerns are raised through the Trust's incident reporting system (Ulysses) and oversight is provided by the Safeguarding Team.
- The safeguarding team have completed 9 consultations in related to Modern Slavery and Human Trafficking in 2025/26.
- The short safeguarding briefing on modern slavery has received 75 views.
- All staff are required to complete mandatory safeguarding training (which includes modern slavery). Compliance with this training has continued at required compliance levels across 2025/26.

Conclusion

The Trust is committed to social and environmental responsibility and has zero tolerance for Modern Slavery and Human Trafficking. Any identified concerns regarding Modern Slavery and Human Trafficking are escalated as part of the organisational safeguarding process. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Pennine Care NHS Foundation Trust slavery and human trafficking statement for the current financial year.

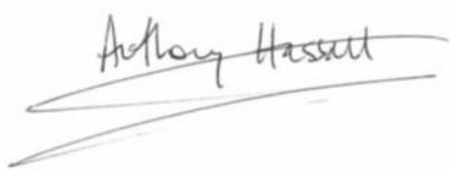
All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the Chief Executive taking responsibility for overall compliance.

The Trust's position on modern slavery is to:

- Comply with legislation and regulatory requirements
- Make suppliers and service providers aware that we promote the requirements of the legislation
- Develop an awareness of human trafficking and modern slavery within our workforce
- Consider human trafficking and modern slavery issues when making procurement decisions

Approved by Board of Directors:

Next review: April 2027

A handwritten signature in dark ink, reading "Anthony Hassall". The signature is written in a cursive style with a long, sweeping horizontal line underneath the name.

Signed: Anthony Hassall

Chief Executive