

# **Manchester University NHS Foundation Trust Modern Slavery and Human Trafficking Statement 2025-2026**

## **1. Introduction**

- 1.1 MFT does not tolerate modern slavery in any of its forms, including slavery and servitude, forced or compulsory labour, and human trafficking within any part of our business or supply chain.

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and sets out the steps the Trust has and will undertake during the financial year 2025–2026 to prevent modern slavery and human trafficking within its operations and supply chains. Manchester University NHS Foundation Trust is driven by our vision to improve the health and quality of life of our diverse population. Our values are:

- We are compassionate
- We are curious
- We are collaborative
- We are inclusive
- We are open and honest

- 1.2 By publishing this statement, the Trust demonstrates its commitment to the principles of the Modern Slavery Act and to operating in ways that are compatible with the Human Rights Act 1998, including upholding the right of individuals to be free from slavery and forced labour.
- 1.3 MFT is committed to ensuring that modern slavery plays no part in the services we deliver or within our supply chains. We are also working to make sure we are caring and protecting the communities we serve from the impact of modern slavery.

## **2. What do we mean by Modern Slavery & Human Trafficking?**

- 2.1 Modern Slavery can take many forms including the trafficking of people, forced labour, servitude, slavery, and commercial organ donation. Any consent victims have given to their treatment will be irrelevant where they have been coerced, deceived, or provided with payment or benefit to achieve that consent.
- 2.2 Modern Slavery is the recruitment, movement, harbouring or receiving of children, young people, or adults by force, coercion, and abuse of vulnerability, deception, or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for several reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.
- 2.3 Children (those aged under 18) are considered victims of trafficking, whether they have been coerced, deceived, or paid to secure their compliance. They need only have been recruited, transported, received, or harboured for the purpose of exploitation.

### **3. About MFT**

- 3.1 Manchester University NHS Foundation Trust (MFT) is one of the largest acute NHS Trusts in England, employing over 30,000 staff comprising ten hospitals across seven separate sites, providing a wide range of services from comprehensive local general hospital care through to highly specialised regional and national services. We are the main provider of hospital care to approximately 750,000 people in Manchester and Trafford and the single biggest provider of specialised services in the North-West of England. We are also the lead provider for a significant number of specialised services including Breast Care, Vascular, Cardiac, Respiratory, Urology Oncology, Paediatrics, Maternity and Gynaecology, Ophthalmology and Genomic Medicine.
- 3.2 MFT hosts the Manchester and Trafford Local Care Organisations which provides integrated out-of-hospital care in Manchester, including community nursing, community therapy services, intermediate care and enablement, and some community-facing general hospital services. Beyond Greater Manchester, we also have significant responsibilities for providing specialist services commissioned by the NHS England Specialised Commissioning Team.

### **4. Current Policies and initiatives**

- 4.1 Our workforce policies provide processes and procedures to ensure that our employees and those employed in our supply chain are always treated fairly.

These include:

- Confirming the identities of all new employees and their right to legally work in the United Kingdom and appointing staff subject to references, immigration checks and identity checks.
- Having a set of values and behaviours that staff are expected to comply with, with all candidates expected to demonstrate these attributes as part of the recruitment selection process.
- Adopting the national pay, terms and conditions of service means that we have the assurance that all staff will be treated fairly and that pay, terms and conditions will comply with the latest legislation. This includes assurance that all staff receive at least the National Minimum Wage in line with current legislation.
- Implementing employment policies and procedures designed to provide guidance and advice to staff and managers and to comply with employment legislation. These are accessible to all staff via our intranet and local governance.
- Committing to creating and ensuring a non-discriminatory and respectful working environment for our staff, in line with our corporate social responsibilities.
- Providing a platform for our employees to raise concerns about poor working practices, through the implementation of policies covering equality, diversity and inclusion; grievance; respect and dignity at work.
- Implementing a network of 'Freedom to Speak Up Champions with appropriate training, who will act as agents of equity and inclusion within the Trust.
- Ensuring appropriate mechanisms to regularly review and track progress on promoting and supporting diversity and inclusion, both as

an employer and service provider. This includes implementing the Workforce Race and Disability Equality Standards, publication, and monitoring of trends in our Workforce data as well as our use of Equality Impact Assessments (EQIA) to identify and manage relevant risk.

- Requiring all staff to undertake mandatory training in relation to diversity and inclusion.
- Staff and members of the public can raise concerns through established safeguarding pathways or whistleblowing mechanisms.
- Our Equality and Diversity Policy in Employment aims to create an inclusive culture and work environment, where everyone feels a sense of belonging and is valued for the difference that they bring.
- MFT is a member of the NHS Blood and Transplant (NHSBT) Advisory Group to ensure our transplant activities follow best practice guidance and comply with the relevant legislations.

## **5. Staff Training**

- 5.1 Staff awareness of Modern Slavery is key to tackling the issue. MFT has embedded Modern Slavery and Human Trafficking awareness raising into Mandatory Safeguarding Training for all staff. The training programme enables staff to be aware of what Modern Slavery is, how to recognise it and what to do if they suspect that someone is a victim.
- 5.2 The MFT quarterly and annual safeguarding reports monitor and review MFT safeguarding contact and referral data in relation to human trafficking and modern slavery.

## **6. MFT Patients & Communities We Serve**

- 6.1 MFT, as a partnership organisation, was involved in the development and implementation of the Manchester Safeguarding Partnership “Staying Safe - Manchester Modern Slavery & Human Trafficking Strategy.” As part of delivering the five priorities identified in the strategy, multi-agency training was commissioned by Manchester Safeguarding Partnership for all partners across Manchester. This has now been incorporated into MFT’s own mandatory safeguarding training courses. MFT is represented at the Modern Slavery and Human Trafficking Partnership Group and continues to work with the police modern slavery unit, immigration, and border force agency along with our social care colleagues providing continued support and dissemination of the Manchester Strategy.
- 6.2 The Strategy will continue to be monitored by the Manchester Safeguarding Partnership’s Complex Safeguarding sub-group. MFT also has a safeguarding accountability structure to ensure the embedding of the wide safeguarding agenda. The MFT Complex Safeguarding sub-group which aligns with the Safeguarding Partnership will ensure that key messages and work streams regarding Modern Slavery are disseminated across the Trust.

## **7. MFT’s Procurement and Supply Chain**

- 7.1 MFT has a total non-pay spend of £600m on goods, equipment and services, alongside a drug spend of £320m in financial year 2025/26. The Trust aims to

achieve value for money and to promote public good. The effective utilisation of the Trust's purchasing requirements adds significantly to the quality of the patient environment; efficacy of patient care and the local/regional economy.

- 7.2 MFT procurement promotes the use of Public Sector Frameworks where there is strong awareness of Modern Slavery in the supply chain. Procurement professionals within the Trust are Members of the Chartered Institute of Procurement and Supply with a requirement to undertake training in Social Value as part of their Continuing Professional development.
- 7.3 MFT Procurement is clear that it expects all potential suppliers to the Trust to be fully compliant with the provisions of the Modern Slavery Act and be able to evidence this compliance. The Trust is working closely with other public sector partners in Manchester and in particular the Oxford Road Corridor to share learnings and supplier intelligence.
- 7.4 The Trust's Supplier and Contract Intelligence Systems reflect HMG Procurement Policy Note 02/23 which outlines how to achieve Modern Slavery Act compliance. The Trust reserves the right to cease supply arrangements where satisfactory assurance of compliance is not achieved.
- 7.5 The Trust recognises that modern slavery risks may arise within complex global supply chains and among vulnerable patient populations. Risk is assessed through procurement due diligence processes, safeguarding governance structures and ongoing contract management arrangements.

## **8. Awareness Raising and Social Value**

- 8.1 MFT fully participates in national and regional networks regarding improving awareness with a focus on Greater Manchester Health organisations and supply chain, together with wider public-sector initiatives such as those led by the GM Health and Social Care Partnership and the Association of GM Authorities supporting cross sector working and shared learnings.
- 8.2 MFT also works with the wider NGO and private sector organisations in GM led by the Co-operative Groups GM Modern Slavery Network. This network aims to develop and share good practice, support victims into work and ensure that GM is leading the way on prevention of Modern Slavery and Human Trafficking.

## **9. Code of Business Conduct**

- 9.1 The Code of Business Conduct fulfils the dual role of protecting our interests and protecting staff from any possible accusation that they have not acted properly. All employees have access to the Code of Business Conduct policy. This Code makes clear the duties and obligations of all staff. It sets the boundaries of acceptable business conduct and behaviour.

## **10. Review of effectiveness**

- 10.1 Our goals for the next financial year form part of our efforts to continuously improve how we protect workers from exploitation. In line with our commitment to comply with the Government's commercial policy, standards, and legislation, we will put in place appropriate measures to do this effectively. Effectiveness of

the Trust's modern slavery controls is monitored through procurement assurance mechanisms, supplier contract management processes, safeguarding referral monitoring and review of compliance data where relevant.

To achieve this, in 2024/2025 we have:

- Applied effective ongoing contract management and quality assurance through collaborative engagement with suppliers to assess risks during selection and approvals processes and put mitigation plans in place if red flags are raised, including monitoring and audits.
- Required suppliers to evidence strong social values by including social value evaluation criteria (where relevant and proportionate) to achieve improved social value awareness and compliance across all our activities.
- Ensured all trust tenders have 10% minimum social value award criteria.
- Continued to support our staff to understand what steps they should be taking to prevent modern slavery, including increasing awareness of reporting mechanisms for raising concerns and focus ongoing efforts in delivering/making available appropriate annual training to our procurement staff, to build their capability to identify and address modern slavery risks.
- Strengthened our risk identification and due diligence measures by mandating, where appropriate, suppliers to complete the Modern Slavery Assessment Tool
- Adopted the NHS England Evergreen Supplier Management System and actively promote its use.
- Oversight of equality, diversity and human rights, including issues linked to modern slavery- is managed by the Trust's Equality, Diversity and Human Rights Group, which reports to senior governance structures.

In 2025/2026 we will

- Implement the new NHSE and DHSC Guidance when finalised.
- Adopt the NHSE Atamis Contract Management Module on modern slavery.

10.2 MFT's Modern Slavery & Human Trafficking Statement will be reviewed annually. The next review will be in December 2026. This statement and priorities were agreed by Chief People Officer with involvement from key stakeholders and Service Directors. The statement is published on the MFT website.