

Modern Slavery and Human Trafficking Policy

Aligned guidance regarding safeguarding responsibilities, and procurement requirements in the UK

1. Introduction and Purpose

This policy sets out the organisation's commitment to preventing, identifying, and responding to modern slavery and human trafficking in its workforce, services, and supply chains. It is designed to support compliance with the Modern Slavery Act 2015 and reflects NHS expectations that modern slavery risk should be addressed through safeguarding, ethical recruitment, and procurement due diligence. The organisation has zero tolerance for slavery, servitude, forced or compulsory labour, and human trafficking in any part of its activities.

2. Scope

This policy applies to all employees, workers, agency staff, volunteers, contractors, consultants, students, and any other individuals acting on behalf of the organisation. It also applies to procurement activity, contract management, supplier engagement, and safeguarding activity across all services delivered for NHS purposes.

3. Definitions

- **Modern slavery** is an umbrella term covering slavery, servitude, forced or compulsory labour, and human trafficking.
- **Human trafficking** involves arranging or facilitating the travel of another person with a view to exploitation.
- **Forced or compulsory labour** means work or service extracted under menace of penalty and not offered voluntarily.
- **Servitude** involves coercion that creates an obligation to provide services.
- **Supply chain risk** means the risk that goods or services procured for the organisation are connected to slavery or human trafficking at any stage of production, manufacture, recruitment, transport, or delivery.

4. Policy Statement

The organisation is committed to taking reasonable and proportionate steps to prevent modern slavery and human trafficking. This includes promoting safe recruitment practices, maintaining effective safeguarding arrangements, and applying a risk-based approach to procurement and contract management. Modern slavery risk will be considered throughout the commercial lifecycle, including procurement design, tendering, contract award, contract management, and review.

All concerns or suspicions relating to modern slavery must be taken seriously and reported promptly. The organisation will support staff to raise concerns without fear of retaliation and will work with safeguarding leads, procurement teams, partner agencies, and law enforcement where appropriate.

5. Roles and Responsibilities

- **Board or Governing Body:** provides oversight, approves this policy, and promotes a culture of zero tolerance.
- **Chief Executive and Executive Directors:** ensure appropriate systems, resources, and accountability arrangements are in place.
- **Safeguarding Leads:** provide advice on identification, escalation, referral pathways, and multi-agency working for potential victims.
- **Procurement and Contract Managers:** assess and manage modern slavery risks in purchasing and supply chains, maintain records of due diligence, and take reasonable steps where risks are identified.
- **Human Resources and Recruiting Managers:** ensure recruitment and employment practices are lawful, ethical, and alert to indicators of exploitation.
- **All Staff:** remain alert to signs of modern slavery, complete required training, and report concerns in line with this policy.

6. Prevention, Recruitment and Due Diligence

- The organisation will maintain recruitment practices that verify identity, right to work, pay arrangements, and freedom from coercion or debt bondage.
- Recruitment agencies and labour providers must meet legal and contractual standards and be subject to appropriate checks.
- Procurements for goods and services for NHS purposes will include proportionate assessment of modern slavery risk and appropriate mitigation measures.
- Supplier selection, tender documentation, contract terms, and contract management activity should reflect the level of risk and may include declarations, evidence requests, corrective action plans, and escalation where concerns remain.

- Where risks are identified, the organisation will take reasonable steps proportionate to the level of risk, keep clear records of decisions, and review risks when circumstances change.

7. Safeguarding, Reporting and Response

Modern slavery may present through patient contact, workforce concerns, or supply chain intelligence. Staff should be alert to indicators such as restricted freedom of movement, inability to keep identity documents, signs of coercion, unexplained living or working arrangements, fearfulness, or inconsistent accounts. Concerns should be escalated immediately through local safeguarding procedures, line management, procurement escalation routes, or the organisation's speaking up and incident reporting processes, as appropriate.

If an individual is believed to be in immediate danger, staff must contact emergency services without delay. Where there is a safeguarding concern, advice should be sought from the safeguarding team and referral pathways followed in line with local multi-agency procedures and national guidance. The organisation will co-operate with relevant authorities and partners to protect potential victims and address identified risks.

8. Training and Awareness

The organisation will provide training and awareness appropriate to roles. This should include general awareness for all staff, with enhanced training for safeguarding professionals, recruitment teams, procurement staff, and contract managers. Training should support recognition of indicators, reporting responsibilities, and the practical steps required to manage risk and protect people.

9. Monitoring, Assurance and Review

Compliance with this policy will be supported through safeguarding governance, procurement assurance, contract management, workforce controls, and regular review of incidents, concerns, and emerging risks. The organisation should monitor training completion, procurement risk assessments, supplier issues, and safeguarding escalations to identify themes and strengthen controls. This policy should be reviewed at least every two years, or sooner if required by changes in law, NHS guidance, or organisational arrangements.

10. Related Legislation and Guidance

- Modern Slavery Act 2015
- Health and Care Act 2022
- NHS England guidance on tackling modern slavery in NHS procurement
- NHS England modern slavery and human trafficking statement

- Relevant safeguarding policies and local multi-agency procedures

11. Document Control

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