

Modern Slavery Act 2015 and Human Trafficking Statement for 2024/25 Year

In accordance with section 54(1) of the Modern Slavery Act 2015, James Paget University Hospitals NHS Foundation Trust ('the Trust') has zero tolerance of slavery and human trafficking and is committed to preventing such activities, taking all reasonable actions to ensure our supply chains and activities are free from ethical and labour standards abuses.

The Trust provides services from its main hospital site in Gorleston-on-Sea, Norfolk and a small number of other local sites.

Policies, procedures, governance and legal arrangements are robust, to ensure that proper checks and due diligence are applied in employment procedures maintaining compliance with legislation and NHS employment check standards.

All colleagues working at the Trust have a personal responsibility for the prevention of slavery and human trafficking, with our procurement department having lead responsibility for overall compliance. Mandatory training for all staff includes awareness and consideration of duties in relation to modern slavery and human trafficking, taking appropriate action in relation to any concerns and working with partner organisations where relevant. The Trust's safeguarding policies provide further guidance and clear reporting procedures, and the Trust has adopted the NHS Freedom to Speak Up Policy. These policies are reviewed every three years as a minimum. Over the last year, the Trust has also introduced an external independent Guardian Service for improved staff assurance in raising any concerns. In addition, the Safeguarding Team is available to colleagues, providing specialist advice and support.

We use supply chains engaged through relevant NHS and public sector approved procurement framework arrangements to support temporary staffing needs, with compliance with NHS standards being a condition of engagement.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, our procurement staff receive training in this area.

In addition, we have continued to take the following steps:

- Include specific clauses that reflect our obligations under the Modern Slavery Act 2015 in terms and conditions for supply, with use of the NHS Standard Contract templates whenever possible.
- Include pass/fail criteria for Procurement led tender processes and new vendor requests.
- Upskill the Procurement and Supplies Team on the implications of the Act in order that they can support the wider organisation on its implementation.
- Communicate to all high risk suppliers providing an overview of the legislation, stating our intent and expectations.
- Include a specific right to audit against the obligations of the Modern Slavery Act 2015 for those contracts deemed to be of high risk.
- Ensure suppliers engaged outside the normal procurement processes comply with the Modern Slavery Act 2015.
- Ensure staff and other workers employed directly by the Trust are paid at or above

National Minimum Wage requirements and in line with NHS terms and conditions (where appropriate).

- Commit to referring to the appropriate authorities/agencies any concerns of modern slavery or human trafficking that we may identify.
- Ensure compliance with the Public Contract Regulations 2015.

There have been no reported incidents in the year April 2024 to March 2025.

This statement has been approved by our Board of Directors on 28 March 2025 for the year ended 31st March 2025.