

NHS Greater Manchester Modern Slavery and Human Trafficking Statement

2025-2026

Title of report - NHS Greater Manchester Modern Day Slavery and Human Trafficking Statement (Revised June 2025 until June 2026)

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Executive summary - This report contains the updated 2025–26 Modern Slavery and Human Trafficking Statement, which reaffirms the organisation’s legal commitment under the Modern Slavery Act 2015 to prevent slavery and trafficking across its operations and supply chains.

Ratification – GM ICB Board July 2025

1.0 Purpose Of Report

- 1.1. The purpose of this paper is to advise NHS Greater Manchester [NHS GM] Integrated Care Board [ICB] of the annual review requirement for our statement of Modern Slavery and Human Trafficking in accordance with Section 54, Part 6 of the Modern Slavery Act 2015. Organisations are required to publish an annual statement setting out the steps they take to prevent modern slavery in their business and their supply chains
- 1.2. The following NHS GM Modern Day Slavery and Human Trafficking Statement has updated for 2025-26. The NHS GM Chief Officers are asked to consider and approve the statement and agree the publication on the NHS GM internal and external website accordingly.

2.0 Introduction

- 2.1. NHS GM currently has a 2024-25 Modern Slavery and Human Trafficking Statement which is a requirement of the Modern Slavery Act 2015. This requires an annual update for the ICB to ensure alignment with statutory requirements for 2025-26.
- 2.2. There have been no changes to statutory legislation or requirements during the time period so the 2025-26 review updates the previous statement.

3.0 Modern Slavery And Human Trafficking Statement 2025-26

3.1. What Is Modern Day Slavery?

Modern Day Slavery is a violation of a person’s human rights. It can take the form of human trafficking, forced labour, bonded labour, forced or servile marriage, descent-based slavery, and domestic slavery. A person is considered to be in modern slavery if they are;

- Forced to work through mental or physical threat.
- Owned or controlled by an “employer”, usually through mental or physical abuse.
- Dehumanised, treated as a commodity, or sold or bought as “property”.
- Physically constrained or has restrictions placed on their freedom of movement.

3.2. The Use of Slavery in The Production of Goods And Services

Typically, products bought have passed through a long chain of producers, manufacturers, distributors, and retailers who have all participated in its production, delivery and sale. It can therefore be very difficult to certify that a product has or has not been produced using slavery. However, the way in which companies operate and manage their supply chain can affect the likelihood of slavery being a part of the final product. [The Modern Slavery Act 2015](#) places responsibility on organisations to ensure that no slavery has occurred, and this applies not only

to the products they sell or the services they provide themselves but also to their suppliers, and the suppliers of their suppliers, all the way along the supply chain.

3.3. What are we required to do?

Section 54 (1) of the Act requires those organisations with a turnover of 36 million pounds or more to prepare and publish a transparency statement setting out the steps that they have taken during that financial year to ensure that modern slavery and human trafficking are not taking place in their own business or in their supply chains. The Act places responsibility on organisations to ensure that no slavery has occurred, and this applies to the products they sell, the services they provide themselves but also to their suppliers, and the suppliers all the way along the supply chain.

3.4. NHS Greater Manchester modern slavery and human trafficking statement, 2025-26 - for publication:

As commissioners of care and statutory partners of Safeguarding Adult Boards and Safeguarding Children Partnerships, NHS Greater Manchester (NHS GM) plays a key role in supporting efforts and strategic priorities to tackle modern slavery and human trafficking.

NHS GM fully supports the Government's objective to eradicate modern slavery and human trafficking and recognises the significant role the NHS must play in both combating these crimes and supporting victims. We are strongly committed to ensuring that our commissioned services and supply chains comply with all relevant legislative requirements.

NHS GM acknowledges the provisions set out in the Modern Slavery Act 2015 and will ensure it remains open and transparent, effectively utilising its due diligence processes to ensure there is no evidence of modern slavery or human trafficking within the organisation.

As both a local leader in commissioning healthcare for the population of Greater Manchester and as an employer, NHS GM provides the following statement in respect of its commitment to, and efforts in, preventing modern slavery and human trafficking practices across its supply chains and employment practices.

3.5. Our Commitment to Preventing Modern Slavery and Human Trafficking

NHS GM aims to address the risk of modern slavery and human trafficking by:

- Being committed to ensuring there is no modern slavery or human trafficking within our commissioned services and/or supply chains in any part of our business
- Adhering to National NHS Employment Standards, including verification of UK address, right to work in the UK, and obtaining suitable references

- Maintaining systems that support staff in reporting concerns, including via the Freedom to Speak Up initiative
- Continuing to build strong relationships with Providers and making clear our expectations around ethical and legal business behaviour. We expect local, national, and international supply chains to have appropriate anti-slavery and human trafficking policies and procedures in place
- Including modern slavery and human trafficking within the NHS Greater Manchester Integrated Care Board (ICB) Safeguarding Children and Adults at Risk Policy
- Provision of a multi-agency approach to raising awareness of modern slavery and human trafficking, led by the Greater Manchester Challenger Executive Board
- Providing accessible training and information to our workforce on modern slavery and human trafficking

3.6. Our Arrangements for Preventing Modern Slavery and Human Trafficking

NHS GM aims to be as effective as possible in ensuring that modern slavery and human trafficking do not occur within any part of our operations by:

- Maintaining strong working relationships with safeguarding leads in Provider organisations to ensure:
 - Adherence to the Working Time Regulations 1998
 - Safe and fair working conditions
 - Awareness of risks within their supply chains
 - Responsible management practices that comply with all legal requirements, as reflected in policies, procedures, and contracts with suppliers
- Working in partnership across Greater Manchester to monitor and respond to safeguarding referrals related to modern slavery and human trafficking, including the outcomes of investigations
- Continuing robust NHS employment checks and payroll systems (e.g., ensuring individuals brought into the country illegally cannot be employed due to lack of National Insurance numbers and non-compliance with minimum wage laws)
- Ensuring regular communication with commissioned Providers, ensuring they understand and comply with NHS terms and conditions, including modern slavery and human trafficking requirements
- Applying safer recruitment principles in line with our Recruitment and Selection Policy, including identity verification, right-to-work checks, and criminal record screening

- Maintaining policies such as Freedom to Speak Up, Raising Concerns, Dispute Resolution, and Equality and Diversity to support a culture of openness and accountability
- Ensuring our Procurement Policy details how goods and services will be sourced in line with procurement laws and standards. Both the NHS Terms and Conditions for non-clinical procurement and the NHS Standard Contract for clinical procurement require suppliers to comply with relevant legislation
- Raising awareness throughout 2025–2026 of the Modern Slavery Act 2015 across all procurement processes, including requiring Providers to detail their preventative plans and actions
- Continuously review our internal procedures to ensure actions align with anti-slavery and trafficking goals
- Working in partnership with local Adult Safeguarding Boards, Safeguarding Children Partnerships, Community Safety Partnerships, and the Greater Manchester Challenger Executive Board, while also contributing to and influencing NHS England’s work both regionally and nationally

NHS GM fully recognises that combatting modern slavery and human trafficking requires a coordinated, collaborative, and sustained approach.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking Statement for the financial year ending 31st March 2026.