

## **Modern slavery, human trafficking and ethical trading statement**

At Torbay and South Devon NHS Foundation Trust we are committed to improving our practices to combat modern slavery in our business by taking steps, as far as we are able, to ensure that our supply chains are free from slavery and human trafficking. We are committed to ensuring all of our employees are aware of the Modern Slavery Act 2015 and their safeguarding duty to protect and prevent any further harm and abuse when it is identified or suspected that an individual may be or is at risk of modern slavery/human trafficking.

### **About us**

Torbay and South Devon NHS Foundation Trust is an integrated organisation providing acute health care services from Torbay Hospital, community health services and adult social care.

The Trust runs Torbay Hospital and nine community hospitals and provides health and social care across Torbay and South Devon. We have in excess of half a million face to face contacts with patients in their homes and communities every year and see more than 78,000 people in our A&E department. Across Torbay and South Devon we serve a population of more than 375,000 people and a further 100,000 visitors during the summer holidays.

We employ approximately 7,500 people across the Trust including frontline health and social care staff. We also have more than 800 volunteers who continually strive to make a difference to all the people we care for.

It is our aim to provide high-quality, safe health and social care at the right time and in the right place to support the people of Torbay and South Devon to live their lives to the full.

We are making this statement to show our commitment to ethical trading principles and to set out the steps we are taking to identify risks and tackle modern slavery and human trafficking in our Trust and in our supply chains.

### **Our commitment to ethical trading**

We are committed to ethical trading principles and to acquiring goods and services without harm to others. As a relevant body subject to the Public Contract Regulation we will use our rights to exclude suppliers from selection procedures subject to regulations where we have knowledge of an applicant having committed an offence under section 2 or section 4 of the Modern Slavery Act 2015 among other offences.

### **Due diligence and risk assessment**

To help identify and monitor the risk of slavery and human trafficking in our supply chain we will consider the extent to which, where relevant, applicants have complied with their obligations to produce Modern Slavery and Human Trafficking Statements in selection processes. Where concerns are identified we will also consider on a case

by case basis whether to extend this consideration to procurement exercises that are not subject to separate selection processes or are otherwise outside the scope of the regulations.

Where we use frameworks and contracts provided by other Public Authorities, who are also bound by the same regulations, we will use their expertise in these categories to carryout supplier vetting and assist contract management to help us maintain ethical supply chains.

Where we detect unlawful and or unethical practices in existing contracts we will consider the appropriate use of any contractual mechanisms to manage improvement or determine the contract. Our current standard contracts require compliance with the law and maintaining good industry practices.

The Trust reviews its Modern Slavery and Human Trafficking Statement on an annual basis and presents it at the Board of Directors meeting in Public. This demonstrates a public commitment, ensures visibility and encourages reporting standards.

To identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain:

- ✓ The Trust adheres to the National NHS Employment Checks / Standards (this includes employees UK address, right to work in the UK and suitable references)
- ✓ The Trust has systems to encourage the reporting of concerns and the protection of whistleblowers
- ✓ The Trust purchases a significant number of products through NHS Supply Chain, who's 'Supplier Code of Conduct' includes a provision around forced labour. Other contracts are governed by standard NHS Terms & Conditions. High value contracts are effectively managed and relationships built with suppliers.
- ✓ The majority of our purchases utilise existing supply contracts or frameworks which have been negotiated under the NHS Standard Terms and Conditions of Contract, these all have the requirement for suppliers to have suitable anti-slavery and human trafficking policies and processes in place. Where a suitable framework exists we use them in preference to tendering. These are run by NHS procurement hubs and contain the standard Terms & Conditions.
- ✓ The Trust will request all suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through agreement of the UK Government's 'Supplier Code of Conduct'. This set out our commitment to ensuring there is no modern slavery or human trafficking related to TSDFT service delivery and business
- ✓ The Trust upholds professional codes of conduct and practice relating to procurement and supply, including through our Procurement Team's membership of the Chartered Institute of Procurement and Supply (CIPS).

## **Effective action taken to address modern slavery - Performance Indicators**

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 TSDFT 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 procurement department taking responsibility for overall compliance within our supply chain.

## **Training on modern slavery and trafficking**

Safeguarding training is mandatory for all staff and includes information on trafficking and modern day slavery in order to promote the knowledge and understanding of escalating concerns via the Home Office national referral mechanism/duty to notify process.

Approved by: Board of Directors 5 February 2026

Next review: January 2027