

### **MODERN SLAVERY Annual Statement 2025-2026**

This is a 'group statement' for Lincolnshire Community and Hospitals NHS Group (LCHG) pursuant to S54 of the Modern Slavery Act 2015 and sets out the steps that LCHG has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain. The aim of this statement is to demonstrate that the Group follows good practice, and reasonable steps are taken to prevent, to understand potential modern slavery and human trafficking risks and to implement effective systems and controls.

Modern slavery encompasses domestic servitude, forced labour, criminal exploitation, and sexual exploitation. The Group has a zero-tolerance approach to any form of modern slavery or human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to put effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

As a Group we are committed to ensuring that 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 the individual may be or is at risk of modern slavery/human trafficking.

#### **Group Structure.**

Lincolnshire Community Health Services NHS Trust (LCHS) and United Lincolnshire Teaching Hospital NHS Trust (ULTH) have now come together formally as a Group, called Lincolnshire Community and Hospitals NHS Group (LCHG). This arrangement does not constitute a formal merger of the two organisations but brings the two Trusts together under a single Board and Executive Leadership Team, with the goal of improving the care that is provided to patients both in the community and hospital settings across Lincolnshire.

The group consists of;

- United Lincolnshire Teaching Hospitals NHS Trust, one of the largest Trusts in the country, providing services from 3 acute hospitals in Lincolnshire - Lincoln County Hospital; Pilgrim Hospital, Boston, and Grantham and District Hospital. The Trust also provides a wide variety of outpatient, day case and inpatient services from a range of other community hospitals or local GP clusters. The Trust provides a wide range of healthcare services delivered by over 8,500 trained staff.

And

- Lincolnshire Community Health Services NHS Trust (LCHS), the primary community healthcare provider in Lincolnshire delivering community-based services aimed at supporting people to manage their own health at home and reducing the need for

people to go into hospital. The service provides a wide range of healthcare services delivered by over 2,500 trained staff.

As a group we work closely with a range of partners including commissioners, local councils, NHS England, the private sector, and voluntary organisations to deliver innovative and integrated care to our communities.

**LCHG statement of response:**

We are fully aware of the responsibilities we bear towards our patients, employees, and local communities. We are guided by a strict set of ethical values in all our business dealings and expect our suppliers (i.e. all companies we do business with) to adhere to these same principles. We have zero tolerance for slavery and human trafficking. Staff are expected to report concerns about slavery and human trafficking, and management are expected to act upon them in accordance with our policies and procedures.

LCHG is committed to fulfilling our responsibility to ensure that there is a zero-tolerance approach to Modern Slavery and/or Human Trafficking within our supply chains or within any part of our business. Any identified concerns regarding Modern Slavery and Human Trafficking will be escalated in line with the Organisation's Safeguarding processes, working in conjunction with our partner Agencies. As such:

- The Group adheres to the National NHS Employment Checks/Standards (including employees' UK address; their right to work in the UK and obtaining suitable references). We ensure all UK Workers receive minimum wage and robust immigration checks, to safeguard against human trafficking or individuals being forced to work against their will.
- Our payroll systems monitor modern slavery concerns (i.e. people bought into the Country illegally will not have a National Insurance number).
- We implement a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair Terms of Conditions of employment and access to training and development opportunities, Consulting and negotiating with Trade Unions on proposed changes to employment, work organisation and contractual relations.
- LCHG has systems in place to encourage the reporting of concerns and for the protection of those who do raise concerns.
- LCHG Safeguarding Policies, Training packages and Intranet site contain information relating to the indicators of Human Trafficking/Modern Slavery, for staff awareness and usage.
- The referral process for Adults/Children at risk, along with links to both the Lincolnshire Safeguarding Adult and Lincolnshire Safeguarding Children Boards are located on the Safeguarding section of our Intranet sites.
- Modern slavery is incorporated within safeguarding policies and included within mandatory training programmes for all staff employed by the Group. Training in relation to Modern Day Slavery has been delivered to all staff through our mandatory e-learning training as part of Safeguarding Adults Training level 1 and further training

is provided to staff working with children and vulnerable adults. Training compliance is monitored through local governance meetings and overseen by the Board.

- The Freedom to Speak Up Guardians support staff to escalate concerns, Both FTSUG's have a team of FTSU Champions who can listen and signpost staff to the appropriate channels. The FTSUG's also work to identify and breakdown barriers to Speaking Up and raise awareness of its importance to both staff and patient safety across the Trust. The role of the Freedom to Speak Up Guardian is covered at the Trust's monthly corporate induction; the Trust has adopted the National Freedom to Speak Up Policy in line with national guidance and the importance of speaking up is celebrated annually via October Speaking Up week. The FTSUG's also provide the Trust Board with reports quarterly and an Annual Report is produced, summarising all key activity. Trust activities and policies are required to have an Equality Impact Assessment (EQIA) completed
- LCHG aims to be as effective as possible in ensuring that Modern Slavery and Human Trafficking is not taking place in any part of its business or supply chains. The Group adheres to NHS Terms and Conditions relating to Supply of Goods & Services, minimising the risk of slavery practices. This requires suppliers to (i) comply with all relevant Law and Guidance and use Good Industry Practice to ensure that there is no slavery or human trafficking in its supply chains; and (ii) notify the Authority immediately if it becomes aware of any actual or suspected incidents of slavery or human trafficking in its supply chains to support this we;
- LCHG procurement contracts make specific reference to social value and the prevention of modern slavery.
- We endeavour to build long-standing relationships with our suppliers and make clear our expectations of business behaviour. Where national or international supply chains are used, we expect these suppliers to have suitable Anti-Slavery and Human Trafficking Policies and Procedures and, where there is a risk of Slavery and Human Trafficking taking place, steps have been taken to assess and manage that risk.
- We seek assurance that there is a level of communication with the next link in the supply chain and their understanding of, and compliance with, our expectations in relation to the NHS terms and conditions. These conditions relate to issues such as bribery, slavery, and other ethical considerations.
- Require evidence that providers are publishing their modern slavery statement when we procure a new contract.
- LCHG Purchase a significant number of products through the NHS Supply Chain and framework agreements, whose 'supplier code of conduct' includes a provision around forced labour.
- We require all suppliers to comply with the provisions of the UK Modern Slavery Act (2015) through our purchase orders and tender specifications, which set out our commitment to ensuring no modern slavery or human trafficking in relation to our business.
- The Statement will be reviewed and updated on an annual basis and presented to the board.

## Conclusion

This statement has been presented to the Board of Directors and approved by the Board on 6<sup>th</sup> January 2026

Signature: 

**Group Chief Executive Officer, Lincolnshire Community and Hospitals NHS Group.**