NHS
Hampshire and Isle of Wight

Modern Slavery and Human Trafficking Statement 2023-2024

Background and Purpose

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, and abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of, or within the United Kingdom, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, slavery domestic servitude, forced criminality and organ harvesting. People can be victims of modern slavery without being trafficked.

The Modern Slavery Act (2015) introduced changes in UK law focused on increasing transparency in supply chains, to ensure our supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking).

Hampshire and Isle of Wight Integrated Care Board (the ICB) are committed to working with local partners to improve our practice in combatting slavery and human trafficking and to raise awareness, disrupt and respond to Modern Slavery.

Definition of Offences

Slavery, servitude and forced or compulsory labour a person commits an offence if;

i. The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude. Or;
ii. The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour Human Trafficking.

A person commits an offence

i. If the person arranges or facilitates the travel of another person (victim) with a view to being exploited.
ii. It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

A person is exploited if one or more of the following issues are identified in relation to the victim;

- Slavery, servitude, forced or compulsory labour.

- Sexual exploitation
- Removal of organs
- Securing services by force, threats and deception
- Securing services from children, young people and adults at risk of harm or abuse.

Commitment to Prevent Slavery and Human Trafficking

As an authorised statutory body, the ICB commission health care services for the local population, including acute, community and mental health services. The ICBs' Board, executive management team, commissioners and all employees fully support the government's objectives to eradicate modern slavery and human trafficking. The ICB is committed to ensuring that there is no modern slavery or human trafficking in any part of our business activity and in so far as is possible holding our suppliers to account to do likewise.

The NHS standard contracts which NHS England publishes, govern how we engage with our suppliers and require compliance with relevant legislation, including the Modern Slavery Act 2015. The 2022 updates to these contracts strengthen our position on Modern Slavery, extending requirements and the option to terminate for breaches of social and labour laws.

We also have a number of internal policies that support our commitment to eradicating Modern Slavery, such as:

- Freedom to Speak up Whistleblowing Policy
- Managing Safeguarding Allegations Policy
- Safeguarding Policy
- Recruitment Policy
- Procurement Policy

Our Actions in 2023-2024

Our overall approach is driven by compliance with legislative and regulatory requirements and the maintenance and development of good practice in the fields of contracting and employment. Our safeguarding polices and training provision assists professionals to identify and take appropriate action where concerns about modern day slavery and exploitation arise.

All of our staff are required to complete mandatory safeguarding training, which includes awareness on modern slavery. As part of our commissioning assurance process, we have sought evidence from our provider services in regards to their plans and arrangements to prevent modern slavery in their activities and supply chain, which includes ensuring inclusion of the topic within provider services' safeguarding policies and training. Assurances have also been gained from providers that the safeguarding training for staff includes modern slavery, that an annual statement is published in

accordance with the Modern Slavery Act (2015) (where appropriate), and also that this topic is included within their policies.

Throughout the year, we have:

- Confirmed the identities of all new employees and their right to work in the United Kingdom, and pay all our employees above the National Living Wage.
- Provided ICB representation at Hampshire wide Modern Slavery Partnership board and subgroups modern slavery group and HIPS wide Child Exploitation strategic meeting.
- Developed the Allegation Against Staff Management Policy support staff to raise concerns, and where relevant provide protection under the Public Interest Disclosure Act (1998). The policy clarifies that staff must not suffer any detrimental treatment as a result of raising a concern in good faith, in accordance with the Public Interest Disclosure Act (1998).
- We have applied the NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement) when procuring goods and services. Both require suppliers to comply with relevant legislation.
- Provided a Safeguarding Adults and Children Policy which highlights modern slavery and human trafficking as a form of abuse.
- Worked with the Home Office and the Police in relation to potential concerns within providers where care is commissioned by the ICB, such as; domiciliary agencies, nursing and residential homes.
- Worked with our commissioned providers meeting the annual financial threshold to monitor compliance with the Act using internal assurance processes.
- Continued to ensure that job descriptions reflect roles and responsibilities within the ICB in relation to the Act.
- Added a suite of modern slavery resources to the training platform for ICB staff.
- Reviewed and shared learning from serious incidents related to modern slavery.

Review and Next Steps 2024-2025

We intend to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the supply chains of our providers. The ICB commits to:

- Ensuring, that the principles of the Act continues to be embedded and applied in practice.
- Updated the ICB modern slavery policy to ensure that a consistent system policy is provided for all staff.
- Continue to raise awareness of the Modern Slavery Act (2015) internally and as part of all procurement processes. We will request all providers to set out evidence of their plans and arrangements to prevent slavery in their activities and supply chain.

- Work with NHS funded and partner organisations to ensure modern slavery and human trafficking are appropriately prioritised and feature prominently in safeguarding work plans. And that where they meet the stated financial threshold, the provider of care is aware of their duties and an annual statement published.
- Promote the use of the Community Partnership Information forms in relation to missing, exploited and trafficked persons concerns, including intelligence sharing with reference to signs of modern slavery.
- The ICB safeguarding adults, children and looked after children team will provide expert support and advice into the commissioning process and supporting multi-agency work to respond to modern slavery and human trafficking.
- Continue to gain assurance that all commissioned services have access to training on how to identify those who are victims of modern slavery and human trafficking.
- Commitments to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of public funds and the management of its activities.
- Adoption of zero tolerance to corruption and bribery and this policy is endorsed by our Board.
- Continue to contribute and represent the ICB as statutory partners at Modern Slavery Partnership group and HIPS Child Exploitation strategic group.
- Continue to fully support the government's objectives to eradicate modern slavery and human trafficking.
- Call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; in order that together we can help the government reduce the injustice and brutality of modern slavery and human trafficking.

Statement Approved at Safeguarding Adults, Children and Looked After Children Committee on 03.01.2024

Statement Approved by the NHS Hampshire and Isle of Wight Integrated Care Board on 06.03.2024

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.