NICE National Institute for Health and Care Excellence

Modern slavery and human trafficking statement

Organisational role, structure, and supply chains

The National Institute for Health and Care Excellence (NICE) is a non-departmental public body established by the Health and Social Care Act 2012. Our core purpose is to help practitioners and commissioners get the best care to patients fast, while ensuring value for the taxpayer.

We do this by:

- producing useful and usable guidance for health and care practitioners
- providing rigorous, independent assessment of complex evidence for new health technologies
- developing recommendations that focus on what matters most and drive innovation into the hands of health and care practitioners
- encouraging the uptake of best practice to improve outcomes for everyone.

Find out more about our structure and what we do.

We fully support the government's objective to eradicate slavery and human trafficking and acknowledge our role in combating it. We are strongly committed to making sure our supply chains and business activities are free from ethical and labour standards abuse.

We employ over 800 staff, and our pay spend accounts for 71% of our annual expenditure.

Our main areas of non-pay spend are purchasing journals and evidence services for our guidance development and for access by the NHS, information technology and digital services, professional and consultancy services, and general corporate services, such as travel, facilities, and estates.

Our procurement approach for our most common areas of spend follows the Crown Commercial Service frameworks which provides assurance of compliance with procurement best practice. When procuring goods and services, we additionally apply terms and conditions which require suppliers to comply with relevant legislation.

We act ethically and with the highest standards of integrity, quality, probity, openness, and accountability in all our business operations and relationships.

All procurement staff follow the Chartered Institute of Procurement and Supply ethical code in procurement. Ethical and staffing issues form a key part of our induction for new entrants to the procurement team.

While NICE has assessed the modern slavery risk as low due to the nature of our core business activities and purchasing, in the event we identify any modern slavery in our supply chains we would seek to address this immediately.

Organisational policies

We have employment policies and procedures in place designed to provide guidance and advice to staff and managers, and which comply with employment legislation. Our policies are reviewed at least every three years and those most relevant to modern slavery and human trafficking include:

- Contract management framework and guidance.
- Speak up and be heard policy.
- Recruitment and selection policy.
- Grievance policy.
- Dignity at Work policy.

All policies and procedures are available to all staff on our intranet. They are also supported by training sessions for managers.

The speak up and be heard policy allows staff to raise concerns for further investigation.

Our equality, diversity and inclusion, grievance, and dignity at work policies and procedures give a platform for our staff to raise concerns about poor working practices. We have trained Freedom to Speak Up Guardians and Ambassadors available as an avenue for staff to raise issues of concern in confidence. Staff also have access to an employee assistance programme and all information is confidential. On our intranet we also promote the modern slavery helpline and the Gangmasters and Labour Abuse Authority as other ways to report concerns of modern slavery.

We are strongly committed to equality, diversity and inclusion and creating a non-discriminatory and respectful working environment for our staff. We have a set of values and behaviours that all staff are expected to comply with. Job applicants are expected to demonstrate these attributes in the recruitment process.

All staff are appointed subject to references, occupational health checks, immigration checks and identity checks. We work closely with our third-party recruitment provider to ensure they undertake rigorous checks on our behalf. This makes sure we are confident staff have a legal right to work for us before they start. All agency staff are recruited through a Crown Commercial Service framework meaning the agency undergoes robust checks ensuring they operate ethically, responsibly and comply with the law.

By adopting national pay and terms and conditions of service, we have assurance that all staff will be treated equally and fairly, and our terms comply with the latest legislation. This includes the assurance that staff receive, at least, the National Minimum Wage.

Assessing and managing risk

We have a risk assessment in place which is monitored throughout the year and updated with the inclusion of any additional controls and mitigating actions to further minimise the risks. We work with our commercial team in identifying those contracts that are considered to be the highest risk areas.

We have senior level oversight of our risk, response and management of modern slavery and our updated modern slavery statement is submitted to the executive team and Board each year.

Due diligence in relation to modern slavery

Over the last year we undertook a number of actions and initiatives as part of our commitment to prevent modern slavery by:

- Continuing to support all staff to understand what steps to take to prevent modern slavery and increasing awareness of mechanisms for raising concerns.
- Raising awareness to all staff of anti-slavery day which takes place every year on 18 October.
- Continuing to offer effective contract management support and quality assurance to contract managers, through collaborative engagement with suppliers to assess risks during selection and approvals processes.
- Including in our tenders a requirement to comply with the Modern Slavery Act 2015 requiring in scope organisations to respond to the questions on how they ensure their suppliers meet the requirements of the Act.
- Continuing our ongoing programme of sample checking contracts considered to be high risk. In April and May 2025 we reviewed contracts with technology suppliers to ensure compliance with modern slavery legislation. For those technology suppliers that meet the modern slavery criteria, their statements have been examined and incorporated into the contract procurement record.
- Continuing to review and update our risk assessment to understand our exposure to modern slavery and human trafficking.
- Reviewing and updating our modern slavery and human trafficking statement based on best practice in the transparency in supply chains statutory guidance.
- Partnering with our internal payroll team who conducted an audit of our payroll records and bank details making sure they matched the name of the employee as this could be an indicator of coercion or control.

In 2024/25 we had no incidents of modern slavery.

Training

All staff are required to undertake mandatory training in relation to equality, diversity and inclusion (EDI) and we have developed a 5-year workforce EDI roadmap which details our ambitions and key actions.

We will continue to raise awareness and understanding across the organisation of the risk of modern slavery and human trafficking. To further support this, we have:

- Incorporated modern slavery key information into our contract manager training which is undertaken by all new contract managers and added information to our contract manager SharePoint site. Our commercial team also provide support to the contract managers as well as advising them on what action can be taken if concerns are raised throughout the contract period.
- Created a modern slavery page on our staff intranet with useful information and details of how to report concerns.
- Our commercial team members have attended a webinar to improve their awareness and understanding on the new regulations and guidance on modern slavery which included detail on procurement policy note PPN 02/23 – Tackling Modern Slavery in Government Supply Chains. The policy note provides mandatory guidance on how to address the risks of modern slavery in our procurement and supply chains. It makes sure we take responsibility for our supply decisions and supply chain compliance with the legislation.

Effectiveness

We will continue to assess and monitor potential risk areas in modern slavery and human trafficking.

Our next steps for 2025/26 are to:

- Review and update this statement and publish it on our website.
- Monitor, review, and keep up to date our modern slavery risk assessment.

- Sample and review any contracts that are not on the Crown Commercial Service frameworks and those contracts and areas considered to be high risk.
- Conduct an audit of employee payroll and bank details making sure they correspond.
- Continue to monitor the effectiveness with modern slavery in our supply chain and procurement process.
- Produce guidance to support our contract managers in updating the Modern Slavery rating in Atamis (the software used to record information on our contracts). This will enable us to identify the highest risk contracts for increased monitoring.
- Keep abreast of any new legislation and modern slavery updated guidance to ensure we proactively keep up to date with the latest research on what is effective, alongside our response to modern slavery.

All planned actions will be monitored quarterly by the Corporate Office.

Dr Sam Roberts, Chief Executive

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ("the Act") and constitutes our slavery and human trafficking Statement for the financial year ending 31 March 2025.

Approved by the Board on 22 July 2025

Modern slavery helpline on 08000 121 700 or visit the website at www.modernslaveryhelpline.org. Contact the Gangmasters and Labour Abuse Authority on 0800 432 0804 and/or submit a report online.