

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT:

Introduction from the NHS Frimley Integrated Care Board (ICB):

Modern slavery is the recruitment, movement, harbouring or receiving of children and adults, through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.

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). NHS Frimley is committed to work with local partners to improve practice in combatting slavery and human trafficking and to raise awareness, disrupt and respond to Modern Slavery.

Organisational Structure:

As an authorised statutory body, NHS Frimley is responsible for commissioning health services for its local population of approximately 800,000 people across its five Places: Bracknell Forest, North East Hampshire and Farnham, Royal Borough of Windsor and Maidenhead, Slough and Surrey Heath. For further information please see the ICB website: <https://www.frimley.icb.nhs.uk/about-us/modern-slavery-2015-2>

The Chief Executive for NHS Frimley has ultimate accountability for ensuring that the health contribution to safeguarding and promoting the welfare of children and adults is discharged effectively across the whole health economy through commissioning arrangements. The Chief Nursing Officer is the executive lead for safeguarding and has responsibility for providing leadership and gaining assurance in relation to safeguarding issues within the ICB and locality. The ICB employs the expertise of designated safeguarding professionals for both children and adults who support the delivery of the adult safeguarding and safeguarding children's agendas and are responsible for ensuring that NHS Frimley conform to the requirements of the act.

Our commitment to prevent slavery and human trafficking:

NHS Frimley has a zero tolerance approach to modern slavery and any form of abuse. We are 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 to holding our suppliers to account to do likewise.

Our Approach:

NHS Frimley is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery.

Our overall approach will be governed by compliance with legislative and regulatory requirements and the maintenance and development of good practice in the fields of contracting and employment.

NHS Frimley expects commissioned organisations and other companies it engages with

to ensure their goods, materials and labour-related supply chains fully comply with the Modern Slavery Act 2015 and are transparent, accountable, and auditable.

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.

Policies and Procedures:

NHS Frimley has a number of internal policies that support our commitment to eradicating Modern Slavery. Our recruitment and selection processes are robust and support managers to adhere to safe and fair recruitment principles. NHS Frimley complies fully with the NHS Employment Check Standards and the Disclosure & Barring Service (DBS) Code of practice to negate the likelihood of individuals being employed, contracted or commissioned by the ICB who have been trafficked or who are the victims of modern slavery. These include strict requirements in respect of immigration and identity checks, work permits, references and criminal records.

Our policies such as the Bullying and Harassment Policy, Grievance Policy and Procedure, Equality and Diversity Policy, and Freedom to Speak Up (Whistleblowing) Policy provide an additional platform for our employees to raise concerns about poor and inappropriate working practices.

Our Safeguarding Adults and Children policies also provide guidance in relation to managing potential cases of slavery and human trafficking for employees.

Training:

We invest in appropriate statutory and mandatory training on Modern Slavery for all staff to support their understanding and awareness.

Our procurement approach follows the Crown Commercial Service standard. When procuring goods and services, ICBs apply NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with relevant legislation.

During 2022/23 we will continue to raise awareness of the Modern Slavery Act 2015 internally and as part of all procurement processes.

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 ending 31 March 2024.

Fiona Edwards
Chief Executive

NHS Frimley

