



Report to:	Humber & North Yorkshire Integrated Care Board
Date of Meeting:	10 May 2023
Subject:	ICB Modern Slavery Statement
Director Sponsor:	Teresa Fenech
Author:	Nicky Lowe - Head of Corporate Affairs and System Support Angie Rawling – Designated Nurse CLA/Deputy Designated Nurse Safeguarding Children

STATUS OF THE REPORT: *(Please click on the appropriate box)*

Approve Discuss Assurance Information A Regulatory Requirement

SUMMARY OF REPORT: *(A short summary of the key points set out within the report)*

A commercial organisation is required to publish an annual Modern Slavery statement which sets out how the organisation complies with the Modern Slavery Act 2015 if all of the following criteria apply:

- it is a 'body corporate' or a partnership, wherever incorporated or formed
- it carries on a business, or part of a business, in the UK
- it supplies goods or services
- it has an annual turnover of £36 million or more

NHS Humber and North Yorkshire Integrated Care Board (ICB) provides the following statement in respect of its commitment to, and efforts in, preventing slavery and human trafficking practices in the supply chain and employment practices.

RECOMMENDATIONS: *(Specify the recommendation(s) being asked of the meeting - use additional points as appropriate):*

Members are asked to:

- Gain and confirm assurance that this Modern Slavery Statement meets the requirements of the Modern Slavery Act 2015
- Approve the NHS Humber and North Yorkshire ICB Modern Slavery Statement



ICB STRATEGIC OBJECTIVE <i>(please click on the boxes of the relevant strategic objective(s))</i>	
Realising our vision	<input type="checkbox"/>
Improving outcomes in population health and healthcare	<input checked="" type="checkbox"/>
Supporting broader social and economic development	<input type="checkbox"/>
Tackling inequalities in outcomes experience and access	<input checked="" type="checkbox"/>
Delivering our operational plan 2022/23	<input type="checkbox"/>
Developing our ICS	<input checked="" type="checkbox"/>

IMPLICATIONS <i>(Please state N/A against any domain where none are identified)</i>	
Finance	N/A
Quality	Y – This Modern Slavery statement sets out how the ICB is committed to preventing modern slavery and human trafficking in its supply chain and employment practices and how partnership working, safeguarding training and practice supports this.
HR	N/A
Legal / Regulatory	Y - Modern slavery statements set out how the organisation complies with the Modern Slavery Act 2015
Data Protection / IG	N/A
Health inequality / equality	N/A
Conflict of Interest Aspects	N/A
Sustainability	N/A

ASSESSED RISK:
There have been no risks identified.

MONITORING AND ASSURANCE:
The ICB Modern Slavery statement will be reviewed and updated on an annual basis or in line with any changes to regulatory standards and will be brought to the Quality Committee for approval.

This statement will be approved and overseen by the Quality Committee.



ENGAGEMENT: *(Please provide details of any clinical, professional or public involvement work undertaken or planned. Summarise feedback from engagement and explain how this has influenced your report. If you have not yet engaged with stakeholders include a summary of your plans.)*

Commissioning colleagues and Designated Safeguarding Nurses/Professionals across the ICB have been consulted in the writing of the statement.

REPORT EXEMPT FROM PUBLIC DISCLOSURE

No Yes

If yes, please detail the specific grounds for exemption



NHS Humber and North Yorkshire Integrated Care Board response to the requirements of the Modern Slavery Act 2015

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

As local leaders in commissioning and provision of health and care services for the population of NHS Humber and North Yorkshire, and as employers, NHS Humber and North Yorkshire Integrated Care Board (ICB) provides the following statement in respect of its commitment to, and efforts in, preventing slavery and human trafficking practices in the supply chain and employment practices.

Organisational Structure and Supply Chains

As an authorised statutory body, NHS Humber and North Yorkshire ICB is accountable for NHS spend and performance for 1.7million people. The ICB is a core member of the Humber and North Yorkshire Health and Care Partnership, which is one of 42 Integrated Care Systems (ICSs) covering England to meet health and care needs, coordinate services and plan in a way that improves population health and reduces inequalities between different groups. Our partners include five NHS acute hospital trusts, three NHS mental health providers, six Local Authorities, three NHS community services providers and two NHS ambulance trusts. In addition, we also work with around 230 GP practices, 550 residential care homes, 10 hospices, 180 home care companies, multiple independent hospitals and thousands of voluntary and community sector organisations all helping to keep our local people well.

Other Important ICS features are our:

- Place-based teams and partnerships – these partnerships lead design and delivery of integrated services in their local area namely Hull, East Riding, North Lincolnshire, North-East Lincolnshire, North Yorkshire and York.
- Provider collaboratives: bringing NHS and independent providers together across one or more ICSs, working with clinical networks, alliances and other partners, to benefit from working at scale.

The ICB also contracts with a range of organisations to deliver non healthcare provision.

Our approach

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.

The ICB recognises safeguarding as a high priority. To achieve this, we have arrangements in place that provides strong leadership, vision and direction with clear accessible policies and procedures in line with relevant legislation, statutory guidance and best practice.



The response to Human Trafficking and Modern Slavery is coordinated through membership of the Place based Safeguarding Partnerships for both children and adults, Community Safety Partnerships, the Humber Modern Slavery Partnership and the North Yorkshire and York Modern Slavery Partnership.

Our policies and arrangements

Our recruitment processes are highly mature, requiring operational practice that adheres to safe recruitment principles. This includes strict requirements in respect of identity checks in line with the national NHS Employment Checks/Standards, work permits and criminal records/ DBS checks. This safe recruitment principle is supported by Recruitment and Selection policy and employment contracts which comply with UK law.

Our Dignity and Respect at Work policy, Equality and Diversity policies and Raising Concerns Whistleblowing policy provide an additional platform for our employees to raise concerns about poor working practices.

Our safeguarding policies and procedures also provide guidance in relation to managing potential cases of slavery and human trafficking for employees. Any identified concerns regarding Modern Slavery and Human Trafficking would be escalated as part of the organisational safeguarding process and in conjunction with partner agencies, such as the Local Authority and Police.

We will 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.

Training about Modern Slavery and Human Trafficking

We will support our staff to understand and respond to modern slavery and human trafficking, including the impact that each and every individual working in the NHS and partnership organisations can have in keeping present and potential victims of modern slavery and human trafficking safe.

Modern slavery and human trafficking is firmly embedded within our safeguarding training packages to ensure all staff have the latest information and the skills to respond to it. This is compliant with the recommendations in the Safeguarding Child and Young People: Roles and competencies for Health Care Staff; Intercollegiate document. Third Edition; March 2019 and Adult Safeguarding: Roles and Competencies for Health Care Staff Intercollegiate document. First edition: August 2018.

All staff across the six ICB areas undertake mandatory safeguarding training (Safeguarding Adults and Safeguarding Children), which covers modern slavery. The ICB safeguarding teams as well as other partners such as the police, are involved in the development of partnership training packages. Additional training is available through the modern slavery partnerships where the development of bespoke training is based on the assessed need of the multi-agency workforce.



Training developed and offered by NHS England in relation to modern slavery is shared across partnership networks as well as within the ICB.

Due Diligence Process in Supply Chains

As part of our efforts to monitor and reduce the risk of modern slavery and human trafficking occurring in our supply chains there is an obligation for all organisations to comply with the law which is built into the obligations of NHS standard contract. The ICB procurement approach follows the Crown Commercial Service standard and the ICB does not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. Steps taken to reduce the risk of modern slavery occurring within the supply chain include ensuring Selection Questionnaire document, tender document and quotation document are up to date, requesting tenderers to provide assurance that they adhere to the Modern Slavery Act 2015 and ensuring there are robust processes in place to mitigate risks associated with procuring non healthcare services and goods and services.

The ICB applies NHS Terms and Conditions and utilises the NHS Standard Contract for all clinical services. There is a standard terms and conditions for goods, services and works that providers must self-assess against to ensure they are compliant. Both require that commissioned organisations have appropriate systems that safeguard children in line with section 11 of the Children Act (2004) and Working Together to Safeguard Children (2018), and adults in line with The Mental Capacity Act 2005, The Care Act 2014 and The Modern Slavery Act 2015.

The ICB Safeguarding policy states that providers must also have a named responsible individual and a Safeguarding policy and modern slavery statement (in line with the requirements of section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015, where appropriate. The ICB Safeguarding teams work with providers to ensure reporting of any cases to the appropriate forum for review as part of a multiagency partnership. Providers are also required to have proportionate oversight of any sub-contractor arrangements being delivered on their behalf.

Risk assessment and management

The ICB Board and all employees are committed to ensuring that there is no modern slavery or human trafficking in any part of our business activity and considers its potential exposure to the risk of modern slavery and human trafficking as low due to robust employment and procurement processes and in so far as is possible, through holding our providers or suppliers to account to do likewise.

We work closely with our staff and providers and through the relevant partnership arrangements to understand and prioritise any risks.

Key performance indicators to measure effectiveness of steps being taken

Action plans and outcome measures are held and managed by the Modern Slavery Partnerships, of which the ICB has Designated Professional representation, which are reported to and overseen by the respective Community Safety Partnerships, Safeguarding Children Partnerships and the Safeguarding Adult Boards.



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.

Teresa Fenech

**Executive Director Nursing and Quality, NHS Humber and North Yorkshire
Integrated Care Board**

For more information email: hnyicb-hull.hnycontactus@nhs.net

RECOMMENDATIONS

Members are asked to:

- i) Gain and confirm assurance that this Modern Slavery Statement meets the requirements of the Modern Slavery Act 2015
- ii) Approve the NHS Humber and North Yorkshire ICB Modern Slavery Statement
- iii) Consider the need to register on the Government's registry of Modern Slavery Statements <https://modern-slavery-statement-registry.service.gov.uk/>