

Meeting name:	West Yorkshire ICB Board
Agenda item no	21
Meeting date:	19 March 2024
Report title:	Modern Slavery Statement
Report presented by:	Laura Ellis, Director of Corporate Affairs
Report approved by:	Laura Ellis, Director of Corporate Affairs
Report prepared by:	Kim Kingan, Interim Governance Lead

Purpose and Action			
Assurance <input type="checkbox"/>	Decision <input checked="" type="checkbox"/> (approve/recommend/ support/ratify)	Action <input checked="" type="checkbox"/> (review/consider/comment/ discuss/escalate)	Information <input type="checkbox"/>
Previous considerations:			
WY ICB Quality Committee – 27 February 2024			
Executive summary and points for discussion:			
<p>The Modern Slavery Act 2015 was created to promote transparency in UK employment practices and eliminate modern slavery, including practices like forced labour, human trafficking, servitude, and compulsory labour. This paper aims to advise the Board on the requirement of a Modern Slavery and Human Trafficking Statement under Section 54, Part 6 of the Modern Slavery Act 2015. This statement should be easily accessible on our website.</p> <p>The purpose of our statement is to provide a clear outline of our commitment and efforts to prevent slavery and human trafficking practices in our employment and supply chain practices.</p> <p>A small working group, including Procurement and HR colleagues, has developed this statement. We reviewed the Modern Slavery Statement of Leeds CCG, Kirklees Council, and guidance from the Home Office and commercial auditors while creating this statement. We aimed to follow accepted good practices.</p> <p>The statement was shared with the ICB Quality Committee on 27 February 2024, who recommended it for approval to the Board.</p>			
Which purpose(s) of an Integrated Care System does this report align with?			
<input checked="" type="checkbox"/> Improve healthcare outcomes for residents in their system <input checked="" type="checkbox"/> Tackle inequalities in access, experience, and outcomes <input type="checkbox"/> Enhance productivity and value for money <input type="checkbox"/> Support broader social and economic development			
Recommendation(s)			
To APPROVE the ICB Modern Slavery Statement.			

Does the report provide assurance or mitigate any of the strategic threats or significant risks on the Corporate Risk Register or Board Assurance Framework? If yes, please detail which:

The ICB is firmly committed to preventing any form of modern slavery or human trafficking in any aspect of our business activity. We believe that the likelihood of our exposure to such risks is low due to our strong employment and procurement processes. We also hold our providers and suppliers accountable to ensure that they follow similar measures.

We work closely with our staff, providers, and relevant partners to identify and prioritise potential risks and take appropriate measures to address them.

Appendices

1. The Modern Slavery Statement for the forthcoming financial year.

Acronyms and Abbreviations Explained

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What are the implications?

Residents and Communities	None
Quality and Safety	Y – This Modern Slavery statement outlines ICB's commitment to preventing modern slavery and human trafficking in its supply chain and employment practice; partnerships, safeguarding training, and practice support this goal.
Equality, Diversity and Inclusion	None
Finances and Use of Resources	None
Regulation and Legal Requirements	Y - The Modern Slavery statement demonstrates how the ICB complies with the Modern Slavery Act 2015.
Conflicts of Interest	None
Data Protection	None
Transformation and Innovation	None
Environmental and Climate Change	Y - Monitor global trends to ensure we are fully prepared for future challenges that could impact West Yorkshire, such as a potential increase in migration / human relocation driven by war and climate change and the associated risks of exploitation.
Future Decisions and Policy Making	None
Citizen and Stakeholder Engagement	None

NHS West Yorkshire Integrated Care Board Modern Slavery Statement

What is modern slavery?

[Modern Day Slavery](#) is a violation of a person's human rights. It can take the form of human trafficking, forced labour, bonded labour, forced or servile marriage, descent-based slavery, and domestic slavery. A person is in modern slavery if they are:

- Forced to work through mental or physical threats.
- Owned or controlled by an "employer," usually through mental or physical abuse.
- Dehumanised, treated as a commodity, or sold or bought as "property."
- Physically constrained or has restrictions placed on their freedom of movement.

NHS West Yorkshire Integrated Care Board (ICB) remains sensitive to the risk of modern slavery in our supply chains. We are committed to acting responsibly and with integrity in all our business relationships and continue to take measures to implement and enforce effective systems and processes to ensure that modern slavery and human trafficking are not taking place anywhere within our control or influence.

Our organisation and supply chains

As a local leader in commissioning for health care services (including acute, community, mental health, learning disability and primary care services) in Bradford District and Craven, Calderdale, Kirklees, Leeds, and Wakefield District – covering a population over 2.4 million and as an employer, the West Yorkshire ICB provides the following statement regarding its commitment to and efforts in preventing modern slavery and human trafficking practices in the supply chain and employment practices.

Our approach and commitment

As commissioners of care and partners of Safeguarding Adult Boards and Safeguarding Children Partnerships, West Yorkshire ICB plays a crucial role in supporting the work and strategic priorities in tackling modern slavery and human trafficking.

The ICB fully supports the Government's objective to eradicate modern slavery and human trafficking and recognises the significant role the NHS must play in both combatting it and supporting victims. We are committed to ensuring commissioned services and supply chains comply with relevant legislative requirements.

We acknowledge and accept that we are responsible for lawfully, fairly, and honestly conducting our business.

Our commitment to preventing modern slavery and human trafficking.

The ICB aims to address this risk through:

- Being committed to ensuring there is no modern slavery or human trafficking within our commissioned services and/or supply chains in any part of our business.
- Adhering to [National NHS Employment Standards](#) includes checks on an employee's address as part of any check, the right to work in the UK and suitable references.
- Have in place systems to encourage the reporting of concerns and the protection of whistle-blowers.
- Continue to build relationships with our providers and clarify our business behaviour expectations. We expect local, national, and international supply chains to have suitable anti-slavery and human trafficking policies and processes in place.
- Include modern slavery and human trafficking within NHS West Yorkshire ICB Safeguarding Policy and associated policies of PREVENT and Mental Capacity Act and Deprivation of Liberty Policy.
- Being an active partner of the West Yorkshire Anti-Slavery Partnership, where joint initiatives are developed and good practices are shared.
- Provide accessible modern slavery and human trafficking information and training for our workforce.

Our arrangements for preventing modern slavery and human trafficking.

West Yorkshire ICB aims to be as effective as possible in ensuring modern slavery and human trafficking do not take place in any part of our business by:

- Ensuring the response to Human Trafficking and Modern Slavery is coordinated through membership of the Place-based Safeguarding Partnerships for both children and adults on the appropriate Communities Modern Slavery Partnership meeting and West Yorkshire Network Meetings.
- Ensuring communication with our commissioned Providers in the supply chain and being aware of their understanding of, and compliance with, our expectations about NHS terms and conditions, including modern slavery and human trafficking.
- Deploying robust recruitment processes that adhere to safer recruitment principles, including identity, right-to-work, and criminal record checks, in line with the ICB Recruitment and Selection Policy.
- Having policies in place, including Freedom to Speak Up, grievance, dispute resolution, equality, diversity, and inclusion, to demonstrate our commitment to supporting our employees' raising concerns about poor working practices.
- Ensuring our procurement policy outlines how we procure goods and services within procurement legislation and regulation requirements. Both NHS Terms

and Conditions for non-clinical procurement and NHS Standard Contract for clinical procurement require suppliers to comply with relevant legislation.

- Raising awareness during 2024-25 of the Modern Slavery Act 2015 internally as part of all procurement processes, including requesting all providers to set out their plans and arrangements to prevent modern slavery and human trafficking in all their activity and supply chains.
- Continuously review our internal processes and monitor our actions against modern slavery and human trafficking; and
- Working in partnership with our local Adult Safeguarding Boards, Safeguarding Children Partnerships and contributing and influencing the work of NHS England regionally and nationally.

Our Policies

The ICB maintains a comprehensive suite of policies to ensure our compliance with various legal and regulatory obligations. These policies are reviewed regularly, allowing us to review or amend our approach where necessary. In the context of modern slavery, we believe the following ICB-wide policies support us in our compliance:

Policy

Procurement Policy

Purpose

All procurement is in accordance with UK procurement law, and procured services are all subject to standard NHS contract terms and conditions. Suppliers must comply with relevant legislation.

Pay

Our pay structure is based on equal pay principles and rates of pay locally and nationally determined by the National collective agreements.

HR Policies

Our recruitment processes are robust and adhere to safe recruitment principles. This includes strict requirements regarding identity, right to work and criminal record checks.

Bullying and Harassment and
Grievance Policies

Our policies set out expected standards of behaviour and provide additional platforms for employee to raise and resolve concerns about their employment and poor working practices.

Safeguarding Policy and
Freedom to Speak Up Policy

ICB is committed to maintaining a Freedom to Speak Up Policy that allows our employees to report any misconduct or malpractice they



witness. We ensure that all issues are investigated fairly and appropriate actions are taken.

Our Safeguarding policy provides guidance on managing safeguarding concerns, including slavery and human trafficking. Safeguarding teams can offer advice and support to the ICB.

Our supply chain and risk assessment

We believe that the risk of modern slavery is low in our business. However, we assess the likelihood of modern slavery in our supply chain based on risk. We understand that hiring staff and procurement decisions may pose a greater risk. Although some third parties operate within different legal and cultural environments, we expect them to uphold the same ethics and values as us. This includes providing a fair and ethical workplace where workers are treated with dignity and respect and always maintaining the highest human rights standards. We expect these third parties to comply with all applicable laws. We will only partner with organisations where we are confident, they do so.

Due diligence and continuous risk management

We partner with suppliers who share our ethical values and standards. To ensure this, we conduct thorough due diligence on all third-party suppliers when they start collaborating with us and periodically afterwards. As part of our standard engagement terms, suppliers must agree to comply with all applicable laws, including the Modern Slavery Act 2015. Our procurement process also mandates that suppliers confirm their compliance with these regulations.

At the ICB, we hold our suppliers to the same high standards we set. Therefore, we require all third-party suppliers and contractors to complete a comprehensive pre-qualification questionnaire before engaging with us. We constantly review and update this questionnaire to ensure its effectiveness.

Action plans and outcome measures are held and managed by the Place-based Modern Partnerships at which the ICB Safeguarding Team will be represented.

Training

Our employees are at the centre of our policies and processes, and we prioritise communication with them to raise awareness and understanding of our efforts to combat modern slavery and various forms of labour exploitation. We believe that increasing awareness and providing training are the most effective ways to identify

and combat these issues, and we are dedicated to improving the effectiveness of our communication in this area within the ICB.

Slavery and Human Trafficking is part of the organisation's Mandatory Safeguarding Policy Training Programme.

Future progress

We will continue to review and develop our processes to mitigate the risk of modern slavery. In 2024, we will continue to review our procurement process and consider any additional measures to ensure that our obligations under the Act are passed through our supply chain. Our modern slavery training will continue to be mandatory for all employees so we can be confident they possess the knowledge to identify any risks of modern slavery.

The West Yorkshire ICB acknowledges that fighting against modern slavery and human trafficking requires a coordinated, collaborative, and long-term approach. We are committed to continuously improving our knowledge and efforts to eradicate modern slavery. We will review and adapt our approach to manage these risks effectively.

This statement is made under Section 54 of the Modern Slavery Act 2015 and is our modern slavery and human trafficking statement for the year ending 31 March 2025.

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