

Modern slavery and human trafficking statement

This statement comprises the slavery and human trafficking statement of NHS South East London Integrated Care Board (the organisation) for the financial year ending 31st March 2024 in accordance with **Section 54, Part 6 of the Modern Slavery Act 2015**. The organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its corporate activities.

Definition of Offences

Modern day slavery, servitude, forced or compulsory labour.

A person commits an offence if the person:

- holds another person in slavery or servitude and the circumstances are such that person knows or ought to know that the other person is held in slavery or servitude.
- requires another person to perform forced or compulsory labour and the circumstances are such that 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 if:

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

Exploitation

A person is exploited if 1 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 vulnerable persons.

Organisational Structure

As an authorised statutory body, the Integrated Care Board (ICB) is the lead commissioner for health care services (including acute, community, mental health and primary care) in the boroughs of Bexley, Bromley, Greenwich, Lambeth, Lewisham and Southwark. 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 in so far as is possible to holding our suppliers to account to do likewise.

Our approach

The ICB is committed to social and environmental responsibility and has zero tolerance for Modern Slavery and Human Trafficking. 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.

Our overall approach is governed by compliance with legislative and regulatory requirements and the maintenance and development of best practice in the fields of contracting and employment. The ICB ensures that organisations commissioned to provide services 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's Accountable Officer 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 Nurse is a Board member and executive lead for safeguarding, and has responsibility for providing leadership and gaining assurance in relation to safeguarding issues within the ICB and localities. The ICB employs the expertise of Designated professionals for both children and adults; these roles are an integral part of the ICB's activity and support the delivery of the safeguarding adult and children agenda.

Business and supply chains

The ICB is committed to ensuring that there is no Modern Slavery or Human Trafficking in our supply chains or in any part of our business. Safe recruitment principles are adhered to which includes strict requirements in respect of identity checks, work permits and criminal records. The pay structure is derived from national collective agreements and is based on equal pay principles with rates of pay that are nationally determined. Systems are in place to encourage the reporting of concerns and the protection of whistle blowers.

With regards to providers and supply chains, we expect these entities to have suitable anti-slavery, human trafficking and safeguarding policies and processes in place. We will use our routine contract management meetings with major providers to hold them explicitly to account for compliance with the Act and we will implement any relevant clauses contained within the Standard NHS Contract for 2023/24.

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

Accountable Officer: Andrew Bland