



Modern slavery and human trafficking statement.

Introduction from the NHS Buckinghamshire, Oxfordshire, and Berkshire West (BOB) Integrated Care board (ICB):

Modern slavery is the recruitment, movement, harbouring or receiving of children, women, or men 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, which focuses on increasing transparency in supply chains to ensure our supply chains are free from modern slavery (slavery, servitude, forced and compulsory labour and human trafficking).

As both a local leader in commissioning health care services for the population of Buckinghamshire, Oxfordshire, and Berkshire West and as an employer BOB ICB provides the following statement in respect of our commitment to, and efforts in, preventing slavery and human trafficking practices in the supply chain and employment practices.

Our Organisation

As an authorised statutory body, BOB ICB is the lead commissioner for health care services (including acute, community, mental health and learning disability services) in the Buckinghamshire, Oxfordshire, and Berkshire West area – covering a population in excess of one million.

Our commitment to prevent slavery and human trafficking.

The Governing Body, Executive Management Team, commissioners, and all employees are committed to ensuring that there is zero tolerance approach to modern slavery or human trafficking and any form of abuse in any part of our business activity and in so far as is possible to hold our suppliers to account to do likewise.

Our approach

BOB ICB is committed to conducting all business dealings with ethics, integrity, and transparency. We have put effective systems and controls in place to prevent modern slavery in any form. Our compliance with legislative and regulatory requirements and the maintenance and development of good practice in contracting and employment governs our overall approach. We expect all commissioned organisations and other companies we engage with to ensure that their goods, materials, and labour-related supply chains fully comply with the Modern Slavery Act 2015. Such compliance must be transparent, accountable, and auditable. Our engagement with suppliers is governed by the NHS standard contracts published by NHS England, which require compliance with relevant legislation, including the Modern Slavery Act 2015. The latest updates to these contracts,

effective from 2024, strengthen our stance on modern slavery, extending the requirements and the option to terminate for breaches of social and labour laws.

Our policies and arrangements

Our recruitment processes are robust and adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records. Our policies such as Safeguarding Adults and Children policy, Bullying and Harassment policy, Grievance procedure, raising a Concern policy and our freedom to Speak Up Guardians provide guidance and an additional platform for our employees to raise concerns about poor and inappropriate working practices. All staff receive mandatory safeguarding training which includes awareness of modern slavery.

Our procurement approach follows the Crown Commercial Service standard. When procuring goods and services, we 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.

Review of effectiveness

We intend to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the supply chains of our providers. In 2024-2025 we will continue to commit to:

- Providing expert support and advice, via ICB Designated Safeguarding Leads, into the commissioning process and supporting multi-agency work/networks to respond to modern slavery and human trafficking.
- Gaining assurance that all commissioned services have access to training on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information for staff to develop the skills to identify and support individuals who come into contact with health services.
- Working with NHS-funded and partner organisations to ensure modern slavery and human trafficking are appropriately prioritised and feature prominently in safeguarding work plans and strategies.
- Continuing to undertake robust NHS employment checks for ICB staff and support wider health system with any MDS concerns.

