

BSW ICB MODERN SLAVERY STATEMENT – 2025-26

INTRODUCTION

This statement is made in pursuant to section 54(1) of the Modern Slavery Act, 2015. It sets out BaNES, Swindon and Wiltshire (BSW) Integrated Care Board (ICB) commitment to tackling modern slavery and human trafficking in all its activities and its supply chains and the steps BSW ICB is taking to make sure modern slavery or human trafficking is not taking place within our business or supply chain during the year end 31 March 2026.

The Modern Slavery Act 2015 refers to the offences of human trafficking, slavery, servitude and forced or compulsory labour, including sexual or criminal exploitation. NHS England have defined modern slavery as the recruitment, movement, harboring or receiving of children, women, or men through the use of force, coercion, deception and through the abuse of an individual's vulnerability 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.

OUR COMMITMENT TO PREVENT MODERN SLAVERY AND HUMAN TRAFFICKING

BSW ICB 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 taking place within the business or our supply chain. We are committed to continuous improvement in our systems, processes, and policies. We are committed to supporting and safeguarding any individual who we believe is at risk of modern slavery or human trafficking.

As with all NHS organisations BSW ICB has a statutory duty under the Modern Slavery Act 2015 to cooperate with reporting cases of trafficking / modern day Slavery in line with the statutory requirements of the Modern Slavery Act. We are also engaged with key partners to identify local population needs and risks within BSW to inform the local approach to tackling modern slavery including community safety partnerships and, where established, local anti-slavery partnerships.

OUR POLICIES

PROCUREMENT AND CONTRACTING

BSW ICB is bound by the Public Contracts Regulations 2015 for Non-Healthcare (PCRs), The Provider Selection Regime 2023 for Healthcare (PSR) and Procurement Act 2023 (due to be effective from 24 February 2025 replacing the PCR 2015 Regulations for Non-healthcare) as well as the ICB's Standard Financial Instructions (SFIs) and the BSW ICB Procurement Policy.

Our procurement processes ensure that:

- Our supplies are carefully selected through our robust supplier selection criteria/processes
- The main contractor provides details of its material sub-contractor(s) to enable the ICB to check their suitability
- Invitation to tender documents contain a clause on human rights issues and equal opportunities
- The NHS Standard Contract terms and conditions contain clauses (Service Condition 32) where the provider is required ensure that Service Users are protected from abuse, exploitation, radicalisation, serious violence, grooming, neglect and improper or degrading treatment, and must take appropriate action to respond to any allegation or disclosure of any such behaviours in accordance with the Law.
- Our suppliers are carefully selected through our robust supplier selection criteria/processes, including use of the Cabinet Office Standard Selection Questionnaire where appropriate.

Providers are monitored via the NHS Standard Contract, NHS Terms and Conditions for the Supply of Goods and/or Services, or other approved NHS contract forms which require providers to comply with relevant legislation.

HUMAN RESOURCES

We operate several internal policies to ensure we are conducting business in an ethical and transparent manner.

These include:

- a) Recruitment Policy. We operate a robust recruitment policy, including eligibility to work in the UK checks for all directly employed staff, bank staff and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained, to safeguard against human trafficking or individuals being forced to work against their will. We pay all our employees above the National Living Wage.
- b) The ICB and agents acting on behalf of the ICB undertake vigorous checks with respect to paying any member of staff through our payroll system to ensure we are paying the individual employed by our organisation.
- c) Equal Opportunities. We have a range of controls to protect staff from poor treatment and/or exploitation that comply with all respective laws and regulations.
- d) Freedom to Speak Up Policy. We operate this policy so that all employees know that they can raise concerns about how colleagues or people receiving services are being treated, or about poor working practices within our business or supply chain.
- e) Staff Code of Conduct- our core values are:
 - Caring
 - Collaborative
 - Inclusive
 - Accountable
 - Innovative
- f) Supervision – we expect line managers to meet with their staff regularly.

Further advice is available for all staff at the following websites:

Adults: Modern Day Slavery Helpline:

<https://www.modernslaveryhelpline.org>

Tel: 08000 121 700

Children: NSPCC Child Trafficking Advice Centre (CTAC)

Tel: 0808 800 5000

<https://learning.nspcc.org.uk/news/2019/april/podcast-child-trafficking-advice-centre>

Our Organisation has a strong safeguarding governance structure for both Adults, Children and Children Looked After. The Chief Nurse for BSW ICB is the Nominated Executive Officer for Safeguarding for the organisation.

There are Operational and Clinical Leads for Safeguarding Children and Adults in the organisation. The structure includes Designated Professionals, Named GP's, and specialist nurses for safeguarding available for advice on concerns regarding individuals who may be at risk of exploitation, servitude or forced labour. This structure provides assurance both internally and externally.

The ICB Board and the ICB Quality and Outcomes Committee receive regular updates on safeguarding children and adults. BSW ICB also produces Safeguarding Annual Reports, and we are a member of local Multi-Agency Safeguarding Adults and Children's Boards.