

Modern Slavery and Human Trafficking Statement

What is Modern Slavery?

Modern 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. It is a crime often hidden from society where victims are subjected to abuse, inhumane and degrading treatment. Human trafficking involves the recruitment or movement of people for exploitation by the use of threat, force, fraud, or the abuse of vulnerability.

A person is considered to be in modern slavery if :

- a person who is forced to work or serve – through fear and threats of mental or physical violence.
- is owned or controlled by an 'employer' who uses mental or physical abuse to exercise control.
- is dehumanised, treated as a commodity, or bought and sold as 'property'.
- they are kept in substandard working/living conditions.
- If they are physically constrained or have restrictions placed on his/her freedom of movement

The use of slavery in the production of goods and services

Typically, products bought have passed through a long chain of producers, manufacturers, distributors, and retailers who have all participated in its production, delivery and sale. It can therefore be very difficult to certify that a product has or has not been produced using slavery. However, the way in which companies operate and manage their supply chain can affect the likelihood of slavery being a part of the final product. The Modern Slavery Act 2015 places responsibility on organisations to ensure that no slavery has occurred, and this applies not only to the products they sell or the services they provide themselves but also to their suppliers, and the suppliers of their suppliers, all the way along the supply chain.

North East North Cumbria ICB responsibility

Primarily, North East and North Cumbria Integrated Care Board's requirements relate to section 54 of the Act - "*transparency in the supply chain*". Under the Modern Slavery Act 2015, any company with a turnover of more than £36m must produce a statement for each financial year listing the steps it is taking to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business. This statement must be published on company websites and visible to staff, suppliers, customers, and investors.

Our commitment to prevent slavery and human trafficking.

The ICB is responsible for ensuring that high quality and safe health services are accessible to all our communities. It has a wide range of functions including promoting integration of health and care services, improving people's health and wellbeing, and reducing health inequalities.

The ICB, Senior Management Team and all employees support the Government's objectives to eradicate modern slavery and human trafficking and have zero tolerance for modern slavery and breaches in human rights. We recognise the significant role the NHS must play in both combatting it and supporting victims. We are committed to ensuring our supply chains and business activities are free from ethical and labour standard abuses and in so far as is possible to holding our suppliers to account to do likewise.

Our approach

Our overall approach is governed by compliance with legislative and regulatory requirements and the maintenance and development of good practice in the fields of contracting and employment.

NENC ICB will: -

- Support our staff to understand and respond to modern slavery and human trafficking through safeguarding training to all its employees.
- Ensure that all NHS commissioned services staff have access to formal training on modern slavery and human trafficking which will provide the latest information and skills to deal with it.
- Ensure all UK workers receive minimum wage and conduct robust immigration checks.
- Ensure suppliers adhere to the Working Time Directive 1998
- Work with new and existing suppliers to ensure that they sign up to our supplier code of conduct.
- Work with our supply chain partners to ensure that modern slavery is not present in the supply chain and expect all our suppliers to think about the steps they can take to provide us with the assurance that modern slavery is not present in their company.
- Each year we will review our approach and publish an annual statement outlining the steps we are taking to tackle modern slavery.

Our policies and arrangements

Our recruitment processes are highly mature; requiring practices that adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records. We pay all our employees above the minimum wage.

Our relevant HR policies are:-

- Bullying and Harassment at Work policy,
- Safeguarding Adults at Risk policy,
- Grievance policy,
- Equality and Inclusion policy and Freedom to Speak Up (Whistleblowing) policy provide an additional platform for our employees to raise concerns about poor working practices.

For further information about Modern Slavery and Human Trafficking, including how to report a concern go to:

In a non-emergency to report an incident Police helpline: 101 or visit www.police.uk/101

[Crimestoppers](http://www.crimestoppers.org.uk): 0800 555 111

For advice if you suspect an incident:

[Modern Slavery Helpline](https://www.modernslaveryhelpline.org/): 0800 0121 700