

NHS Bedfordshire, Luton and Milton Keynes

Integrated Care Board (BLMK ICB)

Modern Slavery Act Transparency Statement 2025/26

Introduction

Modern Slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

NHS Bedfordshire, Luton and Milton Keynes Integrated Care Board (BLMK ICB) fully supports the Government's objectives to eradicate modern slavery and human trafficking.

This statement details the steps taken by the ICB to counter Modern Slavery, complying with the provisions of the 2015 Act.

Defining Modern Slavery

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking.

These crimes include holding a person in a position of slavery, servitude, forced or compulsory labour, coercing people into committing crime for others or facilitating their travel with the intention of exploiting them soon after. Individuals may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.

Although human trafficking often involves an international cross-border element, it is possible to be a victim of modern slavery within your own country. Victims may be transported a few miles within a town to be forced into jobs they do not want. It is possible to be a victim even if consent has been given to be moved.

Children cannot give consent to being exploited and therefore the element of coercion or deception does not need to be present to prove an offence.

Current policies and initiatives

As commissioners of care and statutory partners in Bedfordshire and Luton safeguarding adults and children's boards and MK Together partnership, BLMK ICB plays a key role in supporting the work

and strategic priorities in tackling Modern Slavery and Trafficking. BLMK ICB fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role the NHS has to play in both combatting it, and also supporting victims. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

Steps taken to date include:

People

- We confirm the identities of all new employees and their right to work in the United Kingdom, and pay all our employees above the National Living Wage
- Through a number of staff policies, including Grievance and Whistle Blowing Policy, we provide a platform for our employees to raise concerns about poor working practices
- Awareness is raised through training for ICB's staff and all health providers are encouraged to do the same and ensure that all front line practitioners are aware of and able to respond to incidents of modern slavery within care settings.

Whistleblowing in the NHS

Staff are made aware of the policy on Raising Concerns at Work (whistleblowing) policy. We assign any concerns for further investigation and offer support to individuals that have suffered fiscal or professional detriment as a result of whistleblowing.

Procurement and our supply chain

BLMK ICB adheres to NHS procurement standards. Our procurement activities take place in England; and our contractors and suppliers are predominantly UK and EU based. When procuring goods and services, we additionally 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 our supply chains.

In 2025/26, our anti-slavery programme will also work to:

- Support our staff to understand and respond to modern slavery and human trafficking, including the impact that each and every individual working in the NHS can have in keeping present and potential future victims of modern slavery and human trafficking safe
- Incorporate modern slavery and human trafficking into our safeguarding training packages to ensure staff have the latest information and the skills to deal with it
- Ensure BLMK ICB is represented on Modern Slavery partnership boards
- Work with NHS commissioned and funded organisations to ensure modern slavery and human trafficking are taken seriously and features prominently in safeguarding agendas and contractual requirements

How to Report Crimes of Modern Slavery

- It is extremely important to be aware that trafficking gangs are dangerous criminals; therefore it is vital members of the public do not attempt to act on suspicions themselves, which may put themselves or the possible victims at risk.
- In the first instance the point of contact for all modern slavery crimes should be the local police force.
- If you have information about modern slavery crimes – those who are committing such crimes or where victims are at risk that requires an immediate response, **dial 999**.
- If you hold information that could lead to the identification, discovery and recovery of victims in the UK, you can contact the modern slavery helpline on **08000 121 700**.

This statement was supported by the BLMK ICB Quality and Performance Committee on 07/03/2025