National Institute for Health and Care Excellence

Board meeting

22 July 2022

Title

Modern slavery and human trafficking statement.

Purpose of paper

For approval

Board action required

The Board is asked to approve the updated statement for publication on the NICE website.

Brief summary

The Modern Slavery Act 2015 requires commercial organisations over a certain size to publish a statement each year setting out what action the organisation has taken during the financial year to prevent modern slavery in their business and supply chain. NICE is not yet required to do so but does so voluntarily along with many other public bodies.

Board sponsor

Jennifer Howells

Director, Finance, Strategy and Transformation

July 2022

Introduction

Modern slavery is an umbrella term that encompasses the offences of slavery, servitude, forced and compulsory labour, and human trafficking.

Background

The Modern Slavery Act 2015 requires commercial organisations over a certain size to publish a statement each year setting out what action the organisation has taken during the financial year to prevent modern slavery in their business and supply chain. Since the Act came into force, many public bodies have published modern slavery statements voluntarily and the Government is planning to extend the obligation to produce a statement to public bodies with a budget of £36m or more when parliamentary time allows.

Key issues

Last year NICE produced its first modern slavery statement. It was approved by the board in July 2021, signed by a director, and published on NICE’s website.

The statement outlined the steps NICE takes relating to recruitment policies and equality legislation to ensure everyone who works for NICE is treated fairly.

Staff in the area most likely to encounter modern slavery received training on how to identify modern slavery and steps to tackle it effectively, including reporting it through appropriate channels. The training based on the Home Office guidance was provided for the facilities team as they were assessed as the highest risk business area which could potentially be exposed to modern slavery through the contracts that they manage. This related to the office cleaning and building maintenance contracts.

An updated statement for NICE is attached. We consider modern slavery to be low risk for NICE in view of the range of HR policies in place and the nature of the contracts NICE has with external organisations, which mainly relate to research and software. The proposed actions therefore reflect the level of risk.

Alongside publication of the statement, our internal communications team will highlight NICE’s commitments around modern slavery and how staff can raise concerns.

NICE received a communication from the Modern Slavery Unit at the Home Office encouraging public bodies to add their statement to the government’s modern slavery statement registry by September 2022. NICE’s statement for last year has been added to the registry.

Board action required

The Board is asked to approve the statement for publication on the website.

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July 2022

Modern slavery and human trafficking statement

The National Institute for Health and Care Excellence (NICE) is a non-departmental public body established by the Health and Social Care Act 2012. Our role is to improve health and wellbeing by putting science and evidence at the heart of health and care decision making.

Find out more about our structure and [what we do](https://www.nice.org.uk/about/what-we-do).

We fully support the government’s objective to eradicate slavery and human trafficking and acknowledge our role in combating it. We are strongly committed to making sure our supply chains and business activities are free from ethical and labour standards abuse.

We act ethically and with the highest standards of integrity, quality, probity, openness and accountability in all our business operations and relationships.

Steps we take

People

All staff are appointed subject to references, health checks, immigration checks and identity checks. This makes sure we are confident staff have a legal right to work for us before they start.

By adopting national pay and terms and conditions of service, we have assurance that all staff will be treated equally and fairly, and our terms comply with the latest legislation. This includes the assurance that staff receive, at least, the National Minimum Wage.

We have employment policies and procedures in place designed to provide guidance and advice to staff and managers, and which comply with employment legislation. All policies and procedures are available to all staff on our intranet. They are also supported by training sessions for managers.

Our equality, diversity and inclusion, grievance, and dignity at work policies and procedures give a platform for our staff to raise concerns about poor working practices. We also have 3 Freedom to Speak Up Guardians available as an avenue for staff to raise issues of concern in confidence.

We’re strongly committed to equality, diversity and inclusion and creating a non-discriminatory and respectful working environment for our staff. We have a set of values and behaviours that all staff are expected to comply with. Job applicants are expected to demonstrate these attributes in the recruitment process.

We have ambitious equality, diversity and inclusion targets to deliver our workforce equality objectives for 2020-24. All staff are required to undertake mandatory staff training in relation to equality, diversity and inclusion.

Whistleblowing

Our whistleblowing policy gives staff a platform to raise concerns for further investigation. It also offers support to anyone who has suffered fiscal or professional detriment as a result of whistleblowing.

Procurement and our supply chains

Our procurement approach for our most common areas of spend follow the Crown Commercial Service frameworks which provides an assurance of compliance with procurement best practice and in all our tenders we include a mandatory requirement to comply with the Modern Slavery Act 2015.

When procuring goods and services, we additionally apply terms and conditions which require suppliers to comply with relevant legislation.

All procurement staff follow the Chartered Institute of Procurement and Supply ethical code in procurement. Ethical and staffing issues form a key part of our induction for new entrants to the procurement team.

Review of effectiveness

In 2021/22 we published our first Modern Slavery statement on the NICE website. We communicated the statement to all staff in September 2021 and delivered training to the facilities team in October, given their roles are most likely to have interaction with individuals, through NICE’s external contracts, who could be exposed to modern slavery and human trafficking.

We will continue to assess and monitor potential risk areas in modern slavery and human trafficking. During 2022/23, we will strengthen our commitment by:

* Supporting all staff to understand what steps to take to prevent modern slavery. This includes increasing awareness of reporting mechanisms for raising concerns.
* Undertaking a formal risk assessment of NICE’s exposure to modern slavery and human trafficking.
* Applying effective contract management support and quality assurance to contract managers. We’ll do this through collaborative engagement with suppliers to assess risks during selection and approvals processes. We’ll also put mitigation plans in place if red flags are raised, including monitoring throughout the commercial life cycle.

We will review this statement annually.

Reporting concerns

Modern Slavery Helpline on tel: 08000 121 700 or at: www.modernslaveryhelpline.org. The Helpline provides information and advice about modern slavery, a 24 hour telephone reporting line and an online reporting function through the website.

Related policies and documents

Contract management framework.

Whistleblowing policy.

Recruitment policy.

Grievance policy.

Dignity at Work policy.

Dr Sam Roberts

Chief Executive

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”) and constitutes our slavery and human trafficking Statement for the financial year ending 31 March 2022. It was approved by the board on 22 July 2022.