

Modern Slavery and Human Trafficking Statement

Neighbourhood Health Group

Financial year: 1 April 2026 – 31 March 2027

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Approved by: Director Primary Care, HR Director, Governance committee

Safeguarding Lead: Dr Ihtesham Sabri

Procurement Lead: Deborah Pullinger

1. Introduction

Neighbourhood Health Group ("NHG", "we", "our" or "the Organisation") is committed to preventing modern slavery and human trafficking in all its forms.

We recognise modern slavery as a serious violation of human rights and a significant safeguarding concern. It can affect people of any age, nationality, gender or background and may involve slavery, servitude, forced or compulsory labour, human trafficking, exploitation, coercion or other forms of abuse.

As an organisation providing NHS-funded healthcare services, we recognise our particular responsibilities in:

- protecting patients who may be experiencing exploitation;
- ensuring our workforce is recruited and employed ethically;
- identifying and responding appropriately to safeguarding concerns;
- considering modern slavery risks within our procurement and supply chains; and
- ensuring that our suppliers and contractors share our commitment to preventing exploitation.

Neighbourhood Health Group has a zero-tolerance approach to modern slavery and human trafficking.

We will take proportionate and risk-based steps to prevent, identify, mitigate and respond to modern slavery risks within our organisation and supply chains.

This statement sets out the measures that NHG has taken, and intends to take, to address these risks.

2. Our organisation

Neighbourhood Health Group provides primary healthcare services within the NHS. NHG is part of ICG Medical and group-level arrangements also apply.

The Organisation currently employs approximately 15 members of staff, (as of August 2026) across clinical, administrative and operational roles.

Our activities may involve the procurement of a range of goods and services, including:

- clinical and medical supplies;
- medical equipment and devices;
- personal protective equipment and clinical consumables;
- cleaning and facilities services;
- waste-management services;
- information technology and telecommunications;
- professional and specialist services;
- recruitment and temporary staffing services;
- maintenance and estates services;
- office supplies and equipment;
- uniforms and workwear; and
- other goods and services required to deliver safe and effective healthcare.

We recognise that modern slavery risks can occur both within our direct operations and further down complex supply chains.

3. Our legal and NHS framework

This statement has been prepared with regard to relevant UK legislation, NHS requirements and government guidance, including:

- the Modern Slavery Act 2015;
- section 54 of the Modern Slavery Act 2015, where applicable;
- the National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025, where applicable;
- NHS England's statutory guidance on tackling modern slavery in NHS procurement;
- NHS England's modern slavery and human trafficking statement;
- relevant NHS safeguarding requirements;
- applicable NHS contractual requirements;

- relevant employment legislation;
- relevant equality and human rights requirements; and
- applicable whistleblowing and Freedom to Speak Up arrangements.

NHG will keep its approach under review to ensure that it remains consistent with changes to legislation, NHS requirements and statutory guidance.

4. Our commitment

Neighbourhood Health Group is committed to:

1. preventing modern slavery and human trafficking within our organisation and supply chains;
2. protecting patients and staff who may be vulnerable to exploitation;
3. maintaining ethical recruitment and employment practices;
4. undertaking proportionate due diligence on suppliers and contractors;
5. considering modern slavery risk when procuring goods and services;
6. providing appropriate safeguarding awareness and training;
7. providing safe mechanisms for concerns to be raised;
8. investigating credible concerns appropriately; and
9. continually reviewing and improving our arrangements.

We recognise that no organisation can guarantee that its supply chains are entirely free from modern slavery. Our objective is therefore to identify risk, take proportionate preventative measures and act promptly where concerns arise.

5. Governance and responsibility

Overall responsibility for ensuring that appropriate arrangements are in place to prevent modern slavery rests with the directors and senior leadership of Neighbourhood Health Group.

The **Safeguarding Lead is Dr Sabri**, who has responsibility for providing safeguarding leadership within the Organisation and supporting appropriate escalation of safeguarding concerns, including concerns relating to exploitation and modern slavery.

Responsibility for procurement and supplier-related modern slavery considerations will sit with:

Procurement Lead: Debbie Pullinger, Primary Care Quality Lead

The Procurement Lead will work with the directors and relevant staff to ensure that modern slavery considerations are incorporated proportionately into procurement and supplier-management arrangements.

Modern slavery risks may also be considered through our wider organisational risk-management, safeguarding, workforce and governance processes.

6. Safeguarding patients

Healthcare professionals can be among the first professionals to encounter people experiencing modern slavery or human trafficking.

NHG recognises that a patient experiencing exploitation may not identify themselves as a victim or may be unable to disclose their circumstances because of fear, coercion, intimidation or control.

Staff are therefore expected to remain alert to potential indicators of exploitation.

These may include:

- unexplained injuries or health problems;
- signs of physical or psychological abuse;
- fear, intimidation or unusual behaviour;
- a person appearing controlled by another individual;
- someone else insisting on speaking for the patient;
- a patient appearing unable to speak freely;
- poor or unsafe living or working conditions;
- lack of control over money, identity documents or personal belongings;
- reluctance to disclose personal circumstances;
- evidence of coercion or exploitation;
- suspected sexual, criminal or labour exploitation; and
- concerns relating to children or adults at risk.

No single indicator necessarily means that modern slavery is taking place. Staff will use professional judgement and follow the Organisation's safeguarding procedures.

Where modern slavery is suspected, staff will:

1. prioritise the immediate safety and wellbeing of the individual;
2. seek to speak with the individual safely and privately where appropriate;
3. follow NHG safeguarding procedures;
4. escalate concerns to the Safeguarding Lead or appropriate safeguarding professional;

5. make appropriate referrals to statutory or specialist services;
6. contact emergency services or the police where there is an immediate risk of serious harm or where otherwise appropriate; and
7. document concerns and actions appropriately and in accordance with information-governance requirements.

NHG will seek to ensure that responses are person-centred, trauma-informed and proportionate to the circumstances.

7. Recruitment and employment

NHG is committed to ethical recruitment and fair employment practices.

We will ensure that appropriate processes are in place to:

- verify the identity of prospective employees;
- undertake appropriate right-to-work checks;
- undertake appropriate pre-employment checks;
- provide clear employment terms and conditions;
- ensure staff receive their contractual and legal entitlements;
- ensure staff understand how to raise concerns;
- protect staff from bullying, intimidation, coercion and exploitation;
- investigate concerns relating to inappropriate employment practices; and
- take appropriate action where exploitation is suspected.

Where recruitment agencies or temporary staffing providers are used, NHG will seek to ensure that they operate lawfully and ethically.

We will not knowingly engage organisations that use forced labour, debt bondage, coercive recruitment practices or other exploitative employment practices.

Where relevant, we will consider the requirements of applicable NHS guidance concerning ethical recruitment and international recruitment of health and social care personnel.

8. Procurement and supply-chain due diligence

NHG recognises that modern slavery can occur within healthcare supply chains, including through subcontractors and further tiers of suppliers.

We are constantly developing and strengthening our procurement arrangements and will seek to make appropriate use of **ICB and NHS procurement frameworks** where suitable and available.

Where NHG procures directly, we will adopt a proportionate and risk-based approach to modern slavery.

This includes:

- assessing the potential modern slavery risk associated with the goods or services;
- considering the geographical origin and complexity of relevant supply chains;
- considering labour-intensive services and sectors;
- assessing the use of subcontractors;
- seeking appropriate supplier assurances;
- reviewing relevant supplier policies and statements;
- considering whether suppliers are required to publish a modern slavery statement;
- incorporating appropriate contractual requirements where proportionate;
- monitoring relevant supplier commitments;
- investigating credible concerns; and
- taking proportionate remedial or contractual action where concerns are identified.

Where NHG uses an NHS or ICB procurement framework, we will seek to rely on the relevant framework's established due-diligence and contractual controls, while retaining responsibility for appropriate local contract management.

Where applicable statutory NHS procurement requirements apply to a particular procurement, NHG will comply with those requirements and have regard to relevant NHS England statutory guidance.

9. Supplier expectations

NHG expects its suppliers, contractors and service providers to share our commitment to preventing modern slavery.

Where proportionate to the risk and nature of the contract, suppliers will be expected to demonstrate that they:

- comply with applicable employment and human rights legislation;
- do not use forced or compulsory labour;
- do not use child labour unlawfully;
- provide lawful and appropriate working conditions;
- do not unlawfully retain workers' identity documents;

- do not use coercive recruitment practices;
- do not charge workers inappropriate recruitment fees;
- undertake appropriate due diligence within their own supply chains;
- have appropriate mechanisms for reporting concerns; and
- take appropriate action when modern slavery concerns are identified.

Where a credible concern arises regarding a supplier or contractor, NHG will assess the circumstances and determine an appropriate response.

This may include requesting further information or evidence, implementing corrective actions, increasing monitoring, escalating the matter to an appropriate authority or reviewing the contractual relationship.

10. Risk assessment and management

NHG will take a proportionate approach to identifying and managing modern slavery risks.

Factors considered include:

- the nature of the goods or service;
- the sector in which the supplier operates;
- geographical risk;
- use of temporary, migrant or agency workers;
- labour-intensive activities;
- complex or opaque supply chains;
- subcontracting arrangements;
- recruitment practices;
- supplier policies and controls;
- previous concerns or incidents; and
- relevant NHS or government information concerning supply-chain risks.

Particular attention is given to higher-risk categories within healthcare supply chains, including certain clinical consumables, personal protective equipment, uniforms, cleaning services and labour-intensive services.

Where a significant risk is identified, NHG will consider appropriate measures to prevent or mitigate that risk.

11. Policies and procedures

Our commitment to preventing modern slavery is supported by our wider organisational policies and procedures, including, as applicable:

- Safeguarding Adults Policy;
- Safeguarding Children Policy;
- Recruitment and Selection Policy;
- Equality, Diversity and Inclusion Policy;
- Staff Code of Conduct;
- Whistleblowing / Freedom to Speak Up arrangements;
- Complaints and Incident Reporting procedures;
- Procurement and Purchasing arrangements;
- Supplier and Contractor Management arrangements;
- Health and Safety Policy; and
- relevant information-governance and confidentiality policies.

These policies will be reviewed periodically to ensure that modern slavery risks are appropriately addressed.

12. Training and awareness

NHG recognises the importance of ensuring that staff understand how modern slavery may present within a healthcare setting.

Modern slavery will be addressed through our safeguarding and staff training arrangements, appropriate to individual roles.

Relevant staff will be supported to understand:

- what modern slavery and human trafficking are;
- how exploitation may present in patients;
- potential indicators of modern slavery;
- how to respond safely to a potential victim;
- how and when to escalate safeguarding concerns;
- when police or emergency intervention may be appropriate;
- how to record concerns appropriately;
- how to raise concerns about colleagues, contractors or suppliers; and
- the importance of professional curiosity.

Additional training or awareness activity may be provided to staff with particular responsibilities for safeguarding, procurement, recruitment, contract management or organisational leadership.

NHG will monitor completion of relevant mandatory training in accordance with its existing training and governance arrangements.

13. Speaking up and raising concerns

NHG is committed to ensuring that concerns about modern slavery can be raised safely.

Concerns can be raised through appropriate:

- safeguarding procedures;
- line-management arrangements;
- incident-reporting processes;
- complaints procedures;
- whistleblowing arrangements; or
- Freedom to Speak Up arrangements, where applicable.

Staff and other individuals will not be disadvantaged for raising a genuine concern in good faith.

Where concerns indicate potential criminal conduct, exploitation or immediate risk of harm, NHG will consider referral to the police or another appropriate statutory authority.

14. Monitoring and key performance indicators

NHG recognises that effective modern slavery arrangements require monitoring and continuous improvement.

We will use proportionate measures to assess the effectiveness of our approach.

These include:

- percentage of relevant staff completing required safeguarding training;
- number and nature of safeguarding concerns involving suspected exploitation or modern slavery;
- evidence of appropriate escalation and management of such concerns;
- proportion of relevant procurement exercises in which modern slavery risk has been considered;
- proportion of relevant suppliers providing appropriate modern slavery assurances;

- number of supplier-related modern slavery concerns identified and addressed;
- review of recruitment and staffing arrangements;
- review of concerns raised through speaking-up arrangements; and
- completion of actions identified through annual review.

These measures will be reviewed periodically and used to identify areas for improvement.

15. Actions for 2026/27

During the 2026/27 financial year, NHG will:

Safeguarding

- Maintain appropriate safeguarding arrangements for identifying and responding to suspected modern slavery.
- Ensure that Dr Sham, as Safeguarding Lead, has appropriate oversight of modern slavery-related safeguarding concerns.
- Ensure relevant staff understand how to identify and escalate concerns.

Workforce

- Maintain appropriate recruitment and pre-employment checking arrangements.
- Ensure staff understand their employment rights and routes for raising concerns.
- Review the use of recruitment agencies and temporary staffing providers where applicable.

Procurement

- Develop and implement a proportionate modern slavery risk assessment approach for relevant procurement.
- Identify appropriate ICB/NHS procurement frameworks for future use.
- Ensure that modern slavery is considered when procuring higher-risk goods and services.
- Identify a named Procurement Lead.

Suppliers

- Introduce proportionate modern slavery requirements into relevant supplier and contractor arrangements.
- Seek appropriate assurances from higher-risk suppliers.
- Monitor and respond to credible concerns involving suppliers or contractors.

Training

- Maintain appropriate safeguarding training.
- Ensure relevant staff receive appropriate awareness of modern slavery and human trafficking.
- Consider additional training for staff involved in procurement, recruitment and contract management.

Governance

- Review this statement annually.
- Record and monitor significant modern slavery risks.
- Review incidents and concerns to identify lessons and improvements.
- Keep arrangements under review in light of changes to NHS requirements and legislation.

16. Review and publication

This statement will be reviewed at least annually and sooner where there are significant changes to legislation, NHS requirements, organisational arrangements or identified modern slavery risks.

The current statement will be made publicly available through the Neighbourhood Health Group website.

Where NHG becomes legally required to publish a statement under section 54 of the Modern Slavery Act 2015, the Organisation will ensure that the statement meets the applicable statutory requirements, including appropriate approval and publication arrangements.

NHG will also keep under review whether its turnover or corporate structure means that section 54 applies to the Organisation in any particular financial year.

17. Approval

This Modern Slavery and Human Trafficking Statement has been approved by the directors of Neighbourhood Health Group Ltd.

Organisation: Neighbourhood Health Group

Financial year covered: 1 April 2026 – 31 March 2027

Approved by: ICG Governance Committee/ M Cleverley/ A d’Esterre

Position: Primary Care Director / HR Director

Date of approval: 1 April 2026

Signed: 

Safeguarding Lead: Dr Sabri / CMO

Procurement Lead: D Pullinger / Primary Care Quality Lead

Date of next review: 31 March 2027

Statement of commitment

Neighbourhood Health Group is committed to playing its part in preventing modern slavery and human trafficking, protecting vulnerable patients and staff, maintaining ethical employment practices and promoting responsible procurement.

We recognise that modern slavery is a complex and evolving risk and that effective prevention requires ongoing vigilance, appropriate safeguarding, responsible procurement, staff awareness and collaboration with NHS and statutory partners.

We will continue to review and strengthen our arrangements and take proportionate action where risks or concerns are identified.