

West Leicestershire CLINICAL COMMISSIONING GROUP

Quality and Performance Committee

17th October 2017

Title of the report:	Modern Slavery & Human Trafficking Statement
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Presenter:	Caroline Trevithick, Chief Nurse & Quality Lead, Nursing & Quality.
Purpose of report:	<p>The Modern Slavery Act 2015 introduced changes in UK law, focused on increasing transparency in supply chains. Specifically, large businesses are now required to disclose the steps they have taken to ensure their business and supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking).</p> <p>Commercial organisations that supply goods or services and have a minimum turnover of £36 million are required to produce a ‘slavery and human trafficking statement’ each financial year. This should set out the steps (if any) taken to ensure modern slavery is not taking place in the organisation's own business and its supply chains. It needs to be approved at Board level, signed by a Director and published in a prominent place on the organisation’s website.</p> <p>Who does the Act apply to?</p> <ul style="list-style-type: none"> a) A body corporate (wherever incorporated) which carries on a business, or part of a business, in any part of the United Kingdom, or b) b) A partnership (wherever formed) which carries on a business, or part of a business in any part of the United Kingdom <p>The Act has direct implications for businesses operating in any sector in the UK, including Clinical Commissioning Groups (CCG’s) and provider organisations.</p> <p>As both a local leader in commissioning health care services for the population of Leicester, Leicestershire and Rutland and as an employer, NHS West Leicestershire CCG is required to provide a statement in respect of its commitment to, and efforts in, preventing slavery and human trafficking practices in the supply chain and employment practices for 2016/17.</p> <p>There are no specific requirements regarding what needs be included in the statement however there is guidance available. NHS England produced a Statement in 2015/16 which can be viewed for reference at: https://www.england.nhs.uk/ourwork/safeguarding/slavery-human-trafficking-statement/</p> <p>The attached statement (appendix 1) was presented to the Leicester, Leicestershire and Rutland Clinical Commissioning Groups (CCG) Safeguarding Group on the 2nd August 2017</p>

and to Leicester City CCG's Governing Body on the 8th August 2017. Some changes were suggested including the including the addition of a definition, and also some clarity regarding how actions would be achieved. The changes were made and endorsed by the Safeguarding group on the 4th October. The paper is presented to the Quality and Performance Committee for information. A plan for commitment to actions moving forward is incorporated into the statement, implementation of which will be monitored via the Safeguarding Group. The statement will be made available on the West Leicestershire CCG public website.

Actions required:

Purpose	To discuss and recommend <input type="checkbox"/> Decision required <input type="checkbox"/> To note <input type="checkbox"/>
Recommendation	For information.
Identified risks and risk management actions	No specific risk areas.

Appendix 1

Statement on the prevention of Slavery and Human trafficking in Leicester City Clinical Commissioning Group

This statement sets out the steps Leicester City CCG has taken to ensure that Slavery and Human Trafficking is not taking place on our business and supply chains.

1. The Modern Slavery Act 2015 introduced changes in UK law, focused on increasing transparency in supply chains. Specifically, large businesses are now required to disclose the steps they have taken to ensure their business and supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking). as well as the steps taken to prevent more people becoming victims.
2. Modern slavery is the recruitment, movement, harboring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception 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. The Home Office estimates there are 13,000 victims and survivors of modern slavery in the UK; 55% of these are female and 35% of all victims are trafficked for sexual exploitation.
3. Commercial organisations that supply goods or services and have a minimum turnover of £36 million are required to produce a 'slavery and human trafficking statement' each financial year. This should set out the steps (if any) taken to ensure modern slavery is not taking place in the organisation's own business and its supply chains. It needs to be approved at Board level, signed by a Director and published in a prominent place on the organisation's website.
4. As both a local leader in commissioning health care services for the population of Leicester, Leicestershire and Rutland and as an employer, NHS Leicester City Clinical Commissioning Group's (the CCG) provides the following statement in respect of its commitment to, and efforts in, preventing slavery and human trafficking practices in the supply chain and employment practices.
5. **Our Organisation**
 - 5.1 As authorised statutory bodies, the 3 LLR CCG's are lead commissioner for health care services (including acute, community, mental health) across Leicester, Leicestershire and Rutland – covering a population in excess of *1.3million*.

6. Our commitment to prevent slavery and human trafficking

- 6.1 The Governing Body, Senior Management Team and all employees are committed to ensuring that there is no modern slavery or human trafficking in any part of our business activity and in so far as is possible to holding our suppliers to account to do likewise.

7. Our approach

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

8. Review of effectiveness

Current Safeguards

- 8.1 Our recruitment processes are robust – requiring practices that adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records
- 8.2 Our policies such as Bullying and Harassment policy, Grievance policy and Whistleblowing policy provide a platform for our employees to raise concerns about poor working practices.
- 8.3 Our procurement approach follows the Crown Commercial Service standard. When procuring goods and services, we apply NHS Terms and Conditions (for nonclinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with relevant legislation.

Our commitment to ongoing prevention

- 8.4 We intend to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the supply chains of our providers. In 2017/18, our anti-slavery programme will also:
- 8.5 Support our staff (including our procurement teams) to understand and respond to modern slavery and human trafficking. We will do this by ensuring supportive resources are made widely available including Department of Health Guidance *Identifying and supporting victims of modern slavery - guidance for health staff*. Local Safeguarding procedures will also be promoted alongside national material.

- 8.6 Ensure that all CCG staff have access to training on how to identify those who are victims of modern slavery and human trafficking via promotion of the Department of Health interactive learning resource for all health staff which supports identification of victims of Modern Slavery and understanding of risks.
- 8.8 Review CCG safeguarding policy to ensure that Modern Slavery and Human Trafficking are integral within the content and staff are directed to support and advice as needed.
- 8.9 Work with our procurement team to ensure they have completed Department of Health interactive learning resource for all health staff and have plans to map their suppliers to understand the potential risks and exposure to modern slavery.
- 9.0 Contracting with providers is a core function of the CCG.**
- 9.1 All of our contracting and commissioning staff are suitably qualified and experienced in managing healthcare contracts and will receive appropriate briefing on the requirements of the Modern Slavery Act 2015.
- 9.3 In 2017/18 we will work with Safeguarding leads in the services we commission to ensure modern slavery and human trafficking are taken seriously and features prominently in safeguarding work plans. We will seek assurance from these providers that they have considered their own requirements in relation to the Modern Slavery Act 2015. We will do this by adapting existing assurance processes to ensure Modern Slavery and Human Trafficking features.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2018.

CCG Executive Lead