

## **Statement on Modern Slavery, Forced Labour and Human Trafficking**

1. The Modern Slavery Act 2015 was introduced to address issues of slavery, servitude, forced or compulsory labour, and human trafficking.

2. The law now requires large businesses to be clear and transparent in describing the measures they take to ensure their direct undertakings and supply chains are free from any of these pernicious elements.

3. Commercial organisations supplying goods and/or services, with a turn-over of £36 million or more per year, are required to produce a “slavery and human trafficking statement” each financial year. This should set out what steps the organisation takes, where legally appropriate, to ensure its own activities and supply chains are free from the listed forms of slavery. This needs to be approved by the board of the organisation, signed by a director and prominently displayed on the organisation’s website.

4. As both a local leader in commissioning health care services for the population within our area and as a local employer, City & Hackney Clinical Commissioning Group (CCG) provides the following statement in respect of our commitment to, and efforts in, preventing modern slavery and human trafficking practices in our supply chain and employment practices.

### **5. Our Organisation**

5.1. As an authorised statutory body, the CCG is the lead commissioner for health care services (including acute, community, mental health) within our defined geographical boundaries. These cover a population in excess of 312,000.

### **6. Our Commitment**

6.2. The Governing Body, Senior Management Team and all employees of the CCG are committed to ensuring that there is no modern slavery or human trafficking in any part of our activity and that, in so far as it is possible, we hold 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 application of good practice in the fields of contracting and employment.

### **8. Recruitment**

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 record checks.

### **9. Policies and Procedures**

9.1. We have a range of policies, contained in our document ***“Working in City & Hackney: A guide (including employment policies) for all members of staff”***. This gives staff information in relation to problems with colleagues, grievances and “whistleblowing”, and provides an additional platform for our employees to raise concerns about poor working practices.

## **10. Procurement**

10.1. The CCG will add a provision to its tender documentation which includes the mandatory exclusion of any bidder who has been convicted of an offence under section 1, 2 or 4 of the Modern Slavery Act 2015. The CCG fully supports the Government's objectives to eradicate modern slavery and human trafficking and will exclude any bidder who has been convicted of an offence under section 1, 2 or 4 of the Modern Slavery Act 2015.

10.2. When procuring goods and services, we apply NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with the Modern Slavery Act 2015 legislation.

## **11. Raising Awareness**

11.1. On a continuing basis and by a variety of means we strive to raise awareness of the Modern Slavery Act 2015 with our staff internally (see appendix 1, attached)

## **12. Contracting and Commissioning**

12.1. All of our contracting and commissioning staff are suitably qualified and experienced in managing healthcare contracts.

12.2. During 2017/18 we will write to all our main providers requesting evidence of their compliance with the Act.

**13. 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.**

## **Appendix 1**

### **Modern Slavery: Note on Raising of Staff Awareness within the CCG**

This will be achieved by the following means:

- Highlighting the issue periodically via the weekly staff bulletin, weekly team brief & quarterly Staff Council
- This will include reference to the following e-learning resources for general staff awareness:
  - [www.e-lfh.org.uk/programmes/modern-slavery/](http://www.e-lfh.org.uk/programmes/modern-slavery/)
  - <https://www.england.nhs.uk/ourwork/safeguarding/our-work/modern-slavery/>
  - <http://www.gla.gov.uk/who-we-are/modern-slavery/who-we-are-modern-slavery-spot-the-signs/>

This is in addition to any specific safeguarding training undertaken by staff in appropriate to their roles.