

Modern slavery & human trafficking statement, NHS Bexley Clinical Commissioning Group

The Modern Slavery Act 2015 introduced changes in UK law which focus on increasing transparency in supply chains, to ensure supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking) and is committed to taking all appropriate action to reduce the risk of slavery and human trafficking in its corporate activities.

Our commitment to prevent modern slavery and human trafficking

As a local leader in commissioning health care services in the London Borough of Bexley, and as an employer, the organisation recognises that it has a responsibility to take a robust approach to raising awareness and reducing the risk of modern slavery in Bexley, both in the supply chain and in employment practices of the CCG and of commissioned services.

Definition of offences

Slavery, servitude and forced or compulsory labour.

A person commits an offence if:

- i. The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or;
- ii. The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

Human Trafficking

A person commits an offence if:

- i. The person arranges or facilitates the travel of another person (victim) with a view to being exploited;
- ii. It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

Exploitation

A person is exploited if one or more of the following issues are identified in relation to the victim:

- i. Slavery, servitude, forced or compulsory labour;
- ii. Sexual exploitation;
- iii. Removal of organs;
- iv. Securing services by force, threats and deception;
- v. Securing services from children, young people and vulnerable persons.

Organisational structure

There is a clear line of accountability for safeguarding within Bexley CCG. The CCG in Bexley comprises of 26 GP member practices and is responsible for planning and buying local NHS services, serving a population of 240,000.

The chief officer is the CCG accountable officer for safeguarding. These responsibilities are delegated to the executive lead (director of governance, quality and performance). All

safeguarding posts in Bexley CCG are recruited to (adult and children's lead and a named GP). The designated professionals provide strategic and professional leadership on all aspects of the health service contribution in Bexley to safeguard and promote welfare of children and adults. The governing body has appointed a GP member as the 'safeguarding champion' on the Board. This role ensures strategic ownership of safeguarding by the governing body.

Our Approach

The CCG recognises safeguarding as a high priority for the organisation. In order to achieve this we ensure that we have arrangements in place to provide strong leadership, vision and direction for safeguarding. We have clear accessible policies and procedures in line with relevant legislation, statutory guidance and best practice. Our overall approach is governed by compliance with legislative and regulatory requirements and the maintenance and development of best practice in the fields of contracting and employment.

Our policies and due diligence

The CCG is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Across London there are multi agency policies and procedures in place for safeguarding adults and children which include modern slavery. The CCG adheres to these policies and works closely with the safeguarding adults board to ensure that they are implemented throughout the London Borough of Bexley. Our recruitment processes ensure practices that adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records. The CCG safeguarding policy makes specific reference to modern slavery and human trafficking.

Systems are in place to encourage the reporting of concerns and the protection of whistle blowers. With regards to providers and supply chains, we expect these entities to have suitable anti-slavery and human trafficking policies and processes in place. We will use our routine contract management meetings with major providers to hold them explicitly to account for compliance with the Act.

All providers are contractually required to report compliance with safeguarding standards to the CCG using the agreed frameworks and specific questions are asked at procurement stage to ensure compliance of commissioned services with the modern slavery legislation.

Training about Slavery and Human Trafficking

Slavery and human trafficking is part of the organisation's mandatory safeguarding children and adults training programme.

Steps we have taken to assess and manage risk

The CCG has zero tolerance for modern slavery and human trafficking. Any identified concerns regarding modern slavery and human trafficking would be escalated as part of the organisational safeguarding process and in conjunction with partner agencies; such as the local authority and police. The CCG are also working in collaboration with the safeguarding board to gain assurances across the borough on all safeguarding issues.

The CCG aims to be as effective as possible in ensuring that modern slavery and human trafficking is not taking place in any part of our business or supply chains by:

- i. Effective interagency working with local authorities, the police and third sector organisations which includes appropriate arrangements for preventing and responding to modern slavery and human trafficking;
- ii. Signing up to the London multi-agency policy and procedures for the protection of adults with care and support needs and to the work of the safeguarding adults board;
- iii. Undertaking robust NHS employment checks and payroll systems;

- iv. Ensuring good communication through contract management meetings, with our commissioned providers in the supply chain and their understanding of, and compliance with, our expectations in relation to the NHS terms and conditions. These conditions relate to issues including bribery, slavery and other ethical considerations.
- v. Requiring the CCG's providers to provide the CCG with assurance around safeguarding compliance within the agreed framework

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our organisation's modern slavery and human trafficking statement for the current financial year.

Signed :