

CCG Modern Slavery and Human Trafficking Statement 2019-2020

Background and Purpose

Modern slavery is the recruitment, movement, harbouring 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 Modern Slavery Act (2015) introduced changes in UK law focused on increasing transparency in supply chains, to ensure our supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking). South Eastern Hampshire Clinical Commissioning Group & Fareham and Gosport Clinical Commissioning Group (SEH CCG & FG CCG) are committed to working with local partners to improve our practice in combatting slavery and human trafficking and to raise awareness, disrupt and respond to Modern Slavery.

Commitment to Prevent Slavery and Human Trafficking

As an authorised statutory body, SEH CCG & FG CCG are the lead commissioners for health care services in the CCGs locality, including acute, community and mental health services. The Governing Body, Executive Management Team, commissioners and all employees fully support the government's objectives to eradicate modern slavery and human trafficking. SEH CCG & FG CCG 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.

Our Actions in 2018-2019

Our overall approach has been governed by compliance with legislative and regulatory requirements and the maintenance and development of good practice in the fields of contracting and employment.

All of our contracting and commissioning staff have been provided with mandatory safeguarding training, which includes awareness on Modern Slavery. As part of our commissioning assurance process we have sought evidence from our provider services in regards to their plans and arrangements to prevent slavery in their activities and supply chain, this includes ensuring inclusion of the topic within provider services' safeguarding policies and training.

Throughout the year, we have:

- Confirmed the identities of all new employees and their right to work in the United Kingdom, and pay all our employees above the National Living Wage.
- Provided a Whistleblowing and Concerns Policies to support staff to raise concerns, and where relevant provide protection under the Public Interest Disclosure Act (1998). The policies confirm that staff must not suffer any

detrimental treatment as a result of raising a concern in good faith, in accordance with the Public Interest Disclosure Act (1998).

- We have applied the NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement) when procuring goods and services. Both require suppliers to comply with relevant legislation.
- Provided a Safeguarding Adults and Children Policy which highlights modern slavery and human trafficking as a form of abuse.
- Provided training to both CCG staff and Primary Care staff regarding modern slavery and human trafficking, including information about reporting concerns.
- Worker with our commissioned providers meeting the annual financial threshold to monitor compliance with the Act using our Clinical Quality Review Meetings.

Review and Next Steps 2019-2020

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. The CCG commits to:

- Ensuring that where the CCGs commissions care in the nursing and residential sectors, the independent hospital sector, and other services, that where they meet the stated financial threshold, the provider of care is aware of their duties and an annual statement published.
- Raising awareness of the Modern Slavery Act (2015) internally and as part of all procurement processes. We will request all providers to set out evidence of their plans and arrangements to prevent slavery in their activities and supply chain.
- The Designated Safeguarding Nurse providing expert support and advice into the commissioning process and supporting multi-agency work to respond to modern slavery and human trafficking.
- Gaining assurance that all commissioned services have access to training on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information for staff to develop the skills to identify and support individuals who come into contact with health services.

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 current financial year.