

## **Modern Slavery Act 2015**

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

The Government has introduced a provision in the Modern Slavery Act 2015 that requires organisations to produce a slavery and human trafficking statement. A statement must be produced for each financial year.

1. This requirement applies to any commercial organisation in any sector, that supplies goods or services, and carries on a business in the UK above a specified total turnover. This is currently set at over £34m.

The NHS West Suffolk Clinical Commissioning Group (CCG) fully supports the Government's objectives to eradicate modern slavery and human trafficking.

This statement details the steps taken by the CCG to counter modern slavery, complying with the provisions of the 2015 Act.

### **2. Defining modern slavery and statutory duties**

The terms 'modern slavery' and 'human trafficking' encompass a wide range of crimes of exploitation.

Modern slavery includes slavery, servitude, forced benefit fraud, forced marriage and forced and compulsory labour. It may also involve coercing people into committing crime for others.

Victims may be transported a few miles within a town or across entire continents to be forced into jobs they do not want. Victims can include adults and children and come from all walks of life and backgrounds, including British nationals. A quarter of all victims are children.

Trafficking is the movement of people by means such as force, fraud or deception with the aim of exploiting them. Trafficking in adults involves:

- The act - recruitment, transportation, transfer, harbouring or receipt of persons.
- The means - threat or use of force or other forms of coercion such as abduction, fraud, deception, the abuse of power or of a position of vulnerability or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person.

Trafficking people is a criminal offence. The fact that the adult consents to the intended exploitation is irrelevant where any of the means above have been used.

### **3. Organisational structure and business**

The CCG is an organisation set up by the Health and Social Care Act 2012 to organise the delivery of NHS services in England.

The CCG commissions (plans and buys) local health services for the people of West Suffolk.

It also undertakes activities by partnering with our local authorities and with our Sustainability and Transformation Partnership (STP) with the NHS West Suffolk and NHS North East Essex CCGs.

#### 4. Policies and activity relevant to slavery and human trafficking

##### 4.1. Staff Employed by the CCG

- The CCG carries out rigorous recruitment checks to ensure staff are fit for employment and hold the necessary Disclosure and Barring Scheme clearance
- The CCG adheres to nationally determined pay rates, agreed through collective bargaining at national level, and based on equal pay laws/principles
- The CCG holds specific standards for supporting staff and giving staff opportunities to share any concerns they may have. This includes supervision and appraisals, supplemented by policies such as whistleblowing and grievance policies.

##### 4.2. Our partnership with safeguarding

The CCG is a key partner on its local safeguarding boards.

Its safeguarding teams work across the partnership to safeguard children and adults, strengthening our collective response to modern day slavery and child sexual exploitation.

All professionals who come into contact with adults and children in their everyday work need to be able to identify those who may have been trafficked and be competent to know how to act to support and protect them from harm.

The CCG's safeguarding policies and training provision assists professionals to identify and take appropriate action where concerns about modern day slavery and exploitation arise.

#### 5. Commissioning

##### 5.1. Standards for commissioned services

All NHS commissioned services are required to adhere to safeguarding standards, set within the national NHS contract.

In addition the CCG has specific quality standards in place regarding safeguarding. This includes, but is not limited to:

- safe recruitment standards
- policies to support effective safeguarding practice, and
- leadership within the commissioned service for safeguarding children and adults

The CCG's safeguarding team supports and assures all our NHS commissioned services to have effective safeguarding arrangements in place, including their responses to risks of modern slavery.

## 5.2. Supply Chain

Our procurement activities take place in England; and our contractors and suppliers are predominantly UK and EU-based.

The CCG follows the Crown Commercial Service Standard and includes a mandatory exclusion question regarding the Modern Slavery Act 2015. When procuring services we also use the NHS Standard Contract that requires providers to comply with relevant legislation. Therefore, the CCG is able to influence procurement activity directly carried out by the CCG and procurement activity undertaken by our providers. We expect our providers and other companies we engage with to ensure that their goods, materials and labour-related supply chains fully comply with the Modern Slavery Act 2015 and are:

- transparent, accountable and auditable, and
- free from ethical ambiguities.