

Appendix C

Modern Day Slavery Statement: April 2020

What is modern slavery?

Slavery is a violation of a person's human rights. It can take the form of human trafficking, forced or bonded labour, forced or servile marriage, descent-based slavery and domestic slavery. A person is considered to be in modern slavery if they are:

- Forced to work through mental or physical threat
- Owned or controlled by an "employer", usually through mental or physical abuse
- Dehumanised, treated as a commodity or sold or bought as "property"
- Physically constrained or has restrictions placed on their freedom of movement.

The use of slavery in the production of goods and services

Typically, the products bought nowadays have passed through a long chain of producers, manufacturers, distributors and retailers who have all participated in production, delivery and sale. It can therefore be very difficult to certify that a product has or has not been produced using slavery. However, the way in which companies operate and manage their supply chain can affect the likelihood of slavery being a part of the final product.

The Modern Slavery Act 2015 makes companies responsible for ensuring that no slavery has occurred, and this applies not only to the products they sell or the services they provide themselves but also to their suppliers, and the suppliers of their suppliers, all the way down the supply chain.

What are we required to do?

Primarily our requirements relate to section 54 of the Act: "Transparency in the supply chain". Under the Act, any organisation with a turnover of more than £36m (which includes NHS Cheshire CCG) must produce a statement for each financial year listing the steps it is taking to ensure that slavery and human trafficking are not taking place in any of its supply chains or in any part of its business. This statement must be published on the organisation's websites and be visible to staff, suppliers, customers and investors. The trickle-down effect of the Act will be felt in 2020-21 as businesses begin to ask more searching questions of their suppliers to seek assurance that they are also taking steps to ensure that their supply chains are free from slavery.

Our statement of principles

"NHS Cheshire CCG believes there is no room in our society for modern slavery and human trafficking. We have zero tolerance for modern slavery and breaches in human rights and will ensure this is built into the processes and business practices that we, our partners and suppliers use".

Our approach

What we do:

- When procuring a new contract, we require evidence that providers have published their modern slavery statement.
- Provide safeguarding training, including modern slavery, to our employees and GPs.
- All our commissioned services, including safe recruitment, are procured in accordance with our safeguarding arrangements, which address modern slavery considerations.

By having robust HR policies we:

- Provide safeguarding training to employees and local suppliers, we will extend this to include modern slavery risks and compliance.
- Ensure all UK workers receive minimum wage and robust immigration checks.
- Ensure suppliers adhere to the Working Time Directive 1998
- Ask all our suppliers to agree to our code of conduct
- Work towards elimination of modern slavery in the supply chain, encouraging all our suppliers to think about the steps they can take to provide assurance that Modern slavery is not present in their company
- Ensure safe and fair working conditions
- Ensure that risks within providers' own supply chains are understood
- Ensure that instances of modern slavery are reported appropriately (although this is currently not mandated for health)
- Ensure that zero tolerance, responsible management and compliance with all legal requirements are reflected in policies, procedures, practices and in contracts with suppliers.

Each year we will review our approach and publish an annual statement outlining the steps we are taking to tackle modern slavery.

April 2020