

Modern Day Slavery Statement: April 2022

This statement comprises the slavery and human trafficking statement of NHS Cheshire Clinical Commissioning Group for the financial year ending 31 March 2023 in accordance with Section 54, Part 6 of the Modern Slavery Act 2015. The organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its corporate activities.

Our aim

The aim of this statement is to demonstrate how our CCG follows good practice and all reasonable steps are taken to prevent slavery and human trafficking. All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the procurement department taking responsibility lead for overall compliance

Definition of Modern Slavery

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking.

These crimes include holding a person in a position of slavery, servitude, forced or compulsory labour, being restrained or having restrictions placed on their freedom of movement, securing services by force, threats and deception, coercing people into committing crime for others or facilitating their travel locally, regionally, nationally or internationally, with the intention of exploiting them soon after. Individuals may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.

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.

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.
- All our commissioned services, include safer recruitment processes, and are procured in accordance with our safeguarding arrangements, which address modern slavery considerations.
- We ensure that organisations commissioned to provide services have appropriate systems that safeguard children in line with section 11 of the Children Act (2004), and adults in line with The Care Act (2014), who may be experiencing abuse and exploitation as set out in the above legislation and The Modern Slavery Act (2015).
- We build relationships with our Providers and make clear our expectations of business behaviour and ask all our suppliers to agree to our code of conduct
- we expect our providers and supply chains to have robust anti-slavery and human trafficking policies and processes in place.
- adhere to the National NHS Employment Checks/Standards. This includes employees' UK address, right to work in the UK and suitable references.
- has in place systems to encourage the reporting of concerns and the protection of whistle-blowers
- Ensure all workers in the UK receive minimum wage and robust immigration checks including safe and fair working conditions
- Ensure suppliers adhere to the Working Time Directive 1998
- 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 that risks within providers' own supply chains are understood
- Ensure that instances of modern slavery are reported appropriately

- Ensure that zero tolerance, responsible management and compliance with all legal requirements are reflected in policies, procedures, practices and in contracts with suppliers.
- Ensure there is adherence to the CCG's Standard NHS Contract contractual agreements which contain an obligation within clause SC1.2.2 for providers of services to "*perform all of its obligations under the Contract in accordance with*"
 - 1.1.1 *the terms of this Contract; and*
 - 1.1.2 *the Law; and*
 - 1.1.3 *good practice*

In addition, under *Safety and Safeguarding*, there is a requirement upon all of our providers to have in place programmes for safeguarding and to co-operate with the Commissioner in pursuance of these.

We are committed to ensure that there is due diligence in relation to Modern Slavery and our procurement and supply chains, the CCG also recognises that it is a partner in the multi agency activity to prevent people being exploited and the response to any incidence of modern slavery. The CCG recognises safeguarding as a high priority for the organisation. To achieve this, we ensure we have arrangements in place to provide strong leadership, vision and direction for safeguarding. We make sure we have clear, accessible policies, procedures and training in line with relevant legislation, statutory guidance and best practice.

NHS Cheshire 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. 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.

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