

Modern Day Slavery and Human Trafficking statement for SWL CCGs

The Modern Slavery Act 2015 introduced changes in UK law, focused on increasing transparency in supply chains. Specifically, large businesses are now required to disclose the steps they have taken to ensure their business and supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking).

Commercial organisations that supply goods or services and have a minimum turnover of £36 million are required to produce a 'slavery and human trafficking statement' each financial year. This should set out the steps (if any) taken to ensure modern slavery is not taking place in the organisation's own business and its supply chains. It needs to be approved at Board level, signed by a Director and published in a prominent place on the organisation's website.

As a commissioner of health and care services for patients across Kingston and Richmond health economy, both CCGs provide the following statement in respect of its commitment to, and efforts in, preventing slavery and human trafficking practices in the supply chain and employment practices.

Our organisation

As an authorised statutory body, NHS Kingston and Richmond CCGs as a Local Delivery Unit, is the lead commissioner for health care services (including acute, community, mental health) in both boroughs.

Our commitment to prevent slavery and human trafficking

The Governing Body, Senior Management Team and all employees 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 approach

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

Our policies and arrangements

Our recruitment processes are robust – requiring practices that adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records.

Our policies, including Bullying and Harassment policy, Grievance policy and Whistleblowing policy, provide an additional platform for our employees to raise concerns about poor working practices.

Our contracting and procurement approach follows the requirements set out under the Public Contracts Regulations 2015 and NHS (Procurement, Patient Choice and Completion) (No.2) Regulation 2013.

When contracting and/or procuring goods and services, we apply NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with relevant legislation.

Review of effectiveness

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. In 2019/20, our anti-slavery programme will also:

- Support our staff to understand and respond to modern slavery and human trafficking, and the impact that each individual working in the NHS can have in keeping present and potential future victims of modern slavery and human trafficking safe;
- Ensure that all NHS staff members 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 and will help staff develop the skills to support individuals who come into contact with health services;
- Work with NHS funded organisations to ensure modern slavery and human trafficking are taken seriously and features prominently in safeguarding work plans;
- Review CCG Safeguarding policies to ensure that Modern Slavery and Human Trafficking are integral within the content and that staff are directed to support and advice as needed.

Contracting with providers is a core function of the CCG

All our contracting and commissioning staff are suitably qualified and experienced in managing healthcare contracts and will receive appropriate briefing on the requirements of the Modern Slavery Act 2015 (the Act).

During 2019/20 we will write to all providers requesting evidence of their plans and arrangements to prevent slavery in their activities and supply chain.