

Modern Slavery and Human Trafficking Statement 2021-2022

Background and Purpose

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, and abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the United Kingdom, 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).

Hampshire, Southampton and Isle of Wight Clinical Commissioning Group (the 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.

Definition of Offences

Slavery, servitude and forced or compulsory labour a person commits an offence if;

- i. The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude. Or;
- ii. The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour Human Trafficking.

A person commits an offence

- i. If the person arranges or facilitates the travel of another person (victim) with a view to being exploited.
- ii. It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

A person is exploited if one or more of the following issues are identified in relation to the victim;

- Slavery, servitude, forced or compulsory labour.
- Sexual exploitation
- Removal of organs

- Securing services by force, threats and deception
- Securing services from children, young people and vulnerable person

Commitment to Prevent Slavery and Human Trafficking

As an authorised statutory body, the CCG commission health care services for the local population, including acute, community and mental health services. The CCGs' governing body, executive management team, commissioners and all employees fully support the government's objectives to eradicate modern slavery and human trafficking. The CCG is 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 2020-2021

Our overall approach is driven by compliance with legislative and regulatory requirements and the maintenance and development of good practice in the fields of contracting and employment. Our safeguarding policies and training provision assists professionals to identify and take appropriate action where concerns about modern day slavery and exploitation arise.

All of our contracting and commissioning staff have been provided with mandatory safeguarding training, which includes awareness on modern slavery. This training offer has been expanded to primary care, where level three safeguarding adults and children training has been offered by the CCG. 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. Assurances have also been gained from providers that the safeguarding training for staff includes modern slavery, that an annual statement is published in accordance with the Modern Slavery Act (2015) (where appropriate), and also that this topic is included within their policies.

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 CCG representation at HIPS wide modern slavery group and HIPS wide Child Exploitation strategic meeting.
- Provided the '*Freedom to Speak Up*' policy 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.
- Worked with the Home Office and the Police in relation to potential concerns within providers where care is commissioned by the CCG, such as; domiciliary agencies, nursing and residential homes.
- Provided training to both CCG staff and Primary Care staff regarding modern slavery and human trafficking, including information about reporting concerns and changing themes and trends during the Covid-19 outbreak.
- Worked with our commissioned providers meeting the annual financial threshold to monitor compliance with the Act using our Clinical Quality Review Meetings.
- Continued to ensure that job descriptions reflect roles and responsibilities within the CCG in relation to the Act.

Review and Next Steps 2021-2022

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:

- Ensure that as the CCG transitions in to an Integrated Care System, that the principles of the Act continues to be embedded and applied in practice.
- Update individual CCG modern slavery policies to ensure that a consistent system policy is provided for all staff.
- Designated professionals to develop a modern slavery master class as part of a suite of safeguarding training at levels 3, 4 and 5.
- Continue to raise 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.
- Work with NHS funded and partner organisations to ensure modern slavery and human trafficking are appropriately prioritised and feature prominently in safeguarding work plans. And that where they meet the stated financial threshold, the provider of care is aware of their duties and an annual statement published.

- Promote the use of the Community Partnership Information forms in relation to missing, exploited and trafficked persons concerns, including intelligence sharing with reference to signs of modern slavery.
- The CCG safeguarding adults, children and looked after children team will provide expert support and advice into the commissioning process and supporting multi-agency work to respond to modern slavery and human trafficking.
- Continue to gain assurance that all commissioned services have access to training on how to identify those who are victims of modern slavery and human trafficking.
- Commitments to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of public funds and the management of its activities.
- Develop a safeguarding intranet page for the CCG where staff can access information regarding modern slavery.
- Adoption of zero tolerance to corruption and bribery and this policy is endorsed by our governing body.
- Continue to contribute and represent the CCG as statutory partners at the Hampshire, Isle of Wight, Portsmouth and Southampton (HIPS) Modern Slavery group and HIPS Child Exploitation strategic group.
- Continue to fully support the government's objectives to eradicate modern slavery and human trafficking.
- Call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; in order that together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

Statement signed off by the CCG Chief Nursing Officer

Statement Reviewed / Approved at:

- **Safeguarding Adults, Children and Looked After Children Committee on 08.12.2021**
- **Audit & Risk Committee on 23.03.2022**
- **Governing Body on 06.04.2022**

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.