

Modern Slavery Act (2015) Annual Statement

Modern Slavery Act Statement

1. Leicester, Leicestershire and Rutland CCGs are committed to implementing the requirements of the Modern Slavery Act 2015 and this statement sets out the steps that the CCGs are taking to ensure that our organisation is free from Modern Slavery.
2. The Act sets out that organisations with a turnover of 36 million or more must report annually on the steps that they have taken during the financial year to ensure that slavery and human trafficking are not taking place in their own business or in their supply chains.
3. Section 54 of the Act requires those organisations to prepare and publish a statement setting out the steps that they have taken during that financial year to ensure that slavery and human trafficking are not taking place:

What Is Modern Slavery?

The offence of modern slavery includes subjecting someone to slavery or servitude, forced or compulsory labour, including child labour, and human trafficking, often breaching human rights law, employment law and health and safety regulations, harsh and inhumane treatment, and exploitatively low pay and long hours.

Someone is in slavery if they are:

- Forced to work either through coercion, mental or physical threat
 - owned or controlled by an 'employer' through mental or physical abuse, or the threat of abuse
 - dehumanised by being treated as a commodity or bought and sold as 'property'
 - physically constrained or have unlawful restrictions placed on their freedom of
- Policies and Procedures

As both a local leader in commissioning health care services for the population of Leicester, Leicestershire and Rutland and as an employer, the 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.

Preventing Modern Slavery through our Employment Practices

The CCGs have in place robust risk assessment processes which provide assurance about our approach in tackling any matters related to Modern Slavery. Our policies such as the Bullying and Harassment policy, Grievance policy and Whistleblowing policy provide an additional platform for our employees to raise concerns about poor working practices or any matters related to Modern Slavery.

The CCGs will continue to ensure our recruitment processes are robust by ensuring that there are practices in place that adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records.

Our commitment to contribute to the eradication of modern slavery is reflected in our safeguarding policies and procedures including the Adult Safeguarding and Safeguarding Children policies, which have been developed in accordance with national and local safeguarding legislation and guidance. It includes guidance on recognising suspected human trafficking victim. Our safeguarding training includes information on modern slavery awareness.

Preventing Modern Slavery in our Procurement and our Supply Chain

Contracting with providers is a core function of the CCGs. Our procurement approach follows the Crown Commercial Service standard. When procuring goods and services, we apply NHS Terms and Conditions (for nonclinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with relevant legislation.

The Modern Slavery Act and its explanatory notes are available at <http://www.legislation.gov.uk/ukpg5a/2015/30/contents/enacted>

Procurement arrangements are enhanced with Coronavirus guidance which explains how to address and report on modern slavery risks during the pandemic – *Coronavirus (COVID-19): Reporting Modern Slavery for Businesses*. It is essential that businesses continue their activity to identify and address risks of modern slavery in their operations and supply chains. Full guidance can be found here <https://www.gov.uk/government/publications/coronavirus-covid-19-reporting-modern-slavery-for-businesses>.

Review of Effectiveness

To identify and mitigate the risks of modern slavery and human trafficking in our own organisation and our supply chain we will continue to carry out the following;

- Complete pre-employment checks on staff we employ, confirming their identities and right to work in the United Kingdom. We will also ensure agencies are on approved frameworks.
- Follow NHS Agenda for Change Terms and Conditions to ensure that staff receive fair pay rates and contractual terms.
- Consult with Trade Unions on any proposed changes to employment terms and conditions.
- Support our staff to understand and respond to modern slavery and human trafficking, and the impact of modern slavery on individuals. Each and every individual working in the NHS can have in keeping present and potential future victims of modern slavery and human trafficking safe.
- We will ensure that all NHS staff 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 encounter health care services.

- Work with our partner organisations and other NHS funded organisations to ensure modern slavery and human trafficking are taken seriously and features prominently in safeguarding work plans.

Leicestershire CCG's Governing Body has considered and approved this statement and will continue to support the requirements of the legislation.

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 financial year ending 31st March 2022.