

CCG Modern Slavery and Human Trafficking Statement

Background and purpose:

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, 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). NHS Clinical Commissioning Groups (CCG's) across Surrey 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.

Organisational Structure

NHS Surrey Heartlands CCG and is the host CCG for safeguarding children and adults including looked after children and child death review arrangements on behalf of the Surrey CCG collaborative. We have a clear line of accountability for safeguarding within the CCG. The CCG's Accountable Officer has ultimate accountability for ensuring that the health contribution to safeguarding and promoting the welfare of children and adults is discharged effectively across the whole health economy through commissioning arrangements. The Executive Director of Nursing and Quality is the CCG executive lead for safeguarding, and has responsibility for providing leadership and gaining assurance in relation to safeguarding issues within the CCG and locality. The CCG employs the expertise of Designated Professionals for both children and adults through collaborative arrangements. These roles are an integral part of the CCG's activity and support the delivery of the safeguarding adult and children agenda.

Commitment to Prevent Slavery and Human Trafficking

As an authorised statutory body, CCG's are the lead commissioner's for health care services including acute, community and mental health services across Surrey. The Governing Body, Executive Management Team, commissioners and all employees fully support the government's objectives to eradicate modern slavery and human trafficking. Surrey CCG's 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.

All of our contracting and commissioning staff have mandatory safeguarding training which includes awareness on Modern Slavery.

As part of our commissioning assurance process we will request evidence via the NHS contract schedule from all our providers in regards to their plans and arrangements to prevent slavery in their activities and supply chain.

Policies and arrangements

Our recruitment processes are robust and adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records. Our policies such as Safeguarding Adults and Children policy, Dignity in the workplace policy, Grievance procedure and Raising matters of Concern (Whistleblowing) policy provides an additional platform for our employees to raise concerns about poor and inappropriate working practices.

Our procurement approach follows the Crown Commercial Service standard. When 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. The CCG will commit to:

- CCG Designated Safeguarding Leads providing expert support and advice into the commissioning process and supporting multi-agency work to respond to modern slavery and human trafficking.
- Raising 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.
- Gaining assurance that all commissioned services 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 for staff to develop the skills to identify and support individuals who come into contact with health services
- Work with NHS funded and partner organisations to ensure modern slavery and human trafficking are appropriately prioritised and feature prominently in safeguarding work plans.

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.