

NHS South Tees Clinical Commissioning Group's Response to the Requirements of the Modern Slavery Act 2015

This statement comprises the slavery and human trafficking statement of the NHS South Tees Clinical Commissioning Group (the organisation) for the financial year ending 31st March 2018 in accordance with **Section 54, Part 6 of the Modern Slavery Act 2015**.

The CCG fully supports the Government's objectives to eradicate modern slavery and human trafficking. Our Slavery and Human Trafficking Statement for the financial year ending 31 March 2018 is published on our website by the 30th June 2018.

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.

Definition of Offences

Slavery, servitude and forced or compulsory labour.

A person commits an offence if;

1. 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;
2. 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 if;

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

Exploitation

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

1. Slavery, servitude, forced or compulsory labour.
2. Sexual exploitation
3. Removal of organs
4. Securing services by force, threats or deception
5. Securing services from children, young people and vulnerable persons.

Organisational Structure

NHS South Tees Clinical Commissioning Group (CCG) comprises of 42 GP member practices from across the Middlesbrough and Redcar area, responsible for planning and buying local NHS services, serving a practice population of approximately 300,000

NHS South Tees CCG recognises safeguarding as a high priority for their organisation. In order 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 and procedures in line with relevant legislation, statutory guidance and best practice.

We have a clear line of accountability for safeguarding within South Tees CCG. An Accountable Officer and Executive Lead for safeguarding are in place, and responsibility for children and adults at risk is within the portfolio of the Director of Nursing and Quality. The designated nurses for safeguarding children and adults are an integral part of the CCG activity. NHS South Tees CCG ensures that organisations commissioned to provide services have appropriate systems that safeguard children in line with section 11 of the Children's Act (2004), and Adults in line with the Mental Capacity Act 2005, The Care Act 2014 and the Modern Slavery Act 2015

Procurement

Procurement is a service provided to us by the North of England Commissioning Support Unit. We work with NECS to buy all goods and services that are required or have been commissioned.

In addition, the CCG's contractual agreements (Standard NHS Contract) contain an obligation within clause SC1 2.2 for providers of services to '*perform all 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

The Policies in Relation to Slavery and Human Trafficking

Human Trafficking and modern slavery guidance is to be included in the CCG's Safeguarding Children, and Adults at Risk Policy.

The response to Human Trafficking and Modern Slavery is coordinated under the safeguarding adult and /or safeguarding children's process. The Police are the lead agency and staff are directed to the appropriate Home Office website and the respective Children's and Adults Safeguarding Policies for further information.

The Due Diligence Processes in Relation to Slavery and Human Trafficking in its Business and Supply Chains

We are committed to ensuring that there is no Modern Slavery or Human Trafficking in our supply chains or in any part of our business.

The CCG adheres to the National NHS Employment Checks/Standards. This includes employees UK address, right to work in the UK and suitable references.

We have in place systems to encourage the reporting of concerns using the Freedom to Speak and Raising Concerns at Work Policy.

The CCG is committed to social and environmental responsibility and has a zero tolerance for Modern Slavery and Human Trafficking. 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 Local Authority and Police.

The Effectiveness in ensuring that Slavery and Human Trafficking is not taking place in its Business or Supply Chains, measured against such performance indicators as it considers appropriate

We aim to be as effective as possible in ensuring that modern slavery and Human Trafficking is not taking place in any part of our business and supply chains;

1. Liaison with Safeguarding Leads within Provider Services and Middlesbrough and Redcar Local Authorities to identify safeguarding referrals pertaining to modern slavery and the outcomes of investigations undertaken.
2. NHS employment checks and payroll systems (i.e. people bought into the country illegally will not have a National Insurance number)
3. Level of communication with our commissioned providers in the supply chain and their understanding of, and compliance with, our expectations in relation to the NHS terms and conditions. These conditions relate to issues such as bribery, slavery and other ethical considerations.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act and constitutes our organisation's modern slavery and human trafficking statement for the current financial year ending March 31st 2018.