

Modern Slavery and Human Trafficking Statement

Background and Purpose

NHS Leeds Clinical Commissioning Group (CCG) is 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.

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). As a local leader in commissioning health services for the population of Leeds and as an employer, NHS Leeds CCG provides 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.

Definition of Offences

Slavery, servitude and forced or compulsory labour.

A person commits an offence if:

- 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;
- 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:

- The person arranges or facilitates the travel of another person (victim) with a view to being exploited;
- 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:

- 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 persons.

Our Organisation

As an authorised statutory body, NHS Leeds CCG is the lead commissioner for health care services (including acute, community, mental health and primary care) in Leeds. Further information can be found on the NHS Leeds CCG website <https://www.leedsccg.nhs.uk/>

Our Commitment to Prevent Slavery and Human Trafficking

The Membership, Governing Body, Executive Team and all employees of Leeds CCG, 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 is governed by compliance with legislative and regulatory requirements and the maintenance and development of best practice in the fields of contracting and employment.

The CCG recognises safeguarding as a high priority for the organisation. In order to achieve this, we ensure that we have arrangements in place to provide strong leadership, vision and direction for safeguarding.

Our Policies and arrangements

Our recruitment processes adhere to safe recruitment principles, which includes strict requirements in respect of identity checks, work permits and criminal records/DBS checks. The safe recruitment principles are supported by our Recruitment and Selection Policy.

Our HR policies, such as, Equality and Diversity policy, Grievance policy, Freedom to speak up policy, Acceptable standards of behaviour policy and Whistleblowing policy, provide additional platforms for employees to raise concerns about poor working practices.

Our Children and Adults Safeguarding policy provides guidance in relation to managing safeguarding concerns, including slavery and human trafficking and the CCG safeguarding team are accessible for advice and support to all staff within the CCG.

Our pay structure is derived from the National collective agreements and is based on equal pay principles with rates of pay that are nationally determined.

Our procurement approach follows the Crown Commercial Service Standards. When procuring goods and services, we apply the NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement), both require suppliers to comply with relevant legislation.

All contracting and commissioning staff are suitably qualified and experienced in managing healthcare contracts and receive appropriate level training in relation to the requirements of the Modern Slavery Act (2015).

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.

Seeking assurance regarding how organisation meet the requirements of the Modern Slavery Act 2015 is part of our safeguarding assurance process.

Safeguarding children and adults training is mandatory for all CCG staff and includes modern slavery training requirements appropriate to their role and responsibilities.

The CCG is an active member of the Leeds Modern Slavery Board and the West Yorkshire Anti-Slavery Partnership, where joint initiatives are developed, and good practice is shared.

What we will do

We will continue to review our commissioning cycle for opportunities to ensure a robust approach

We will continue to work with our supply chain partners to ensure that modern slavery is not present in the supply chain. We want all our suppliers to assure us of the steps that they have taken to ensure that :

- Modern slavery is not present in their company
- There are safe and fair working conditions for staff
- The risks within their own supply chain are understood
- There is responsible management and compliance with all legal requirements,
- reflected in policies, procedures, practices and in contracts with suppliers

We will work with partner across West Yorkshire ICS to consider how we can work together

We will review our approach each year and publish an annual statement outlining the steps we are taking to tackle modern slavery

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 2021.