

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 (CCGs) across Waltham Forest and East London (WEL) are committed to work with local partners to improve practice in combatting slavery and human trafficking and to raise awareness, disrupt and respond to Modern Slavery.

Organisational Structure and Supply Chain:

WEL Collaboration is a collaborative arrangement for commissioning with Waltham Forest, Newham and Tower Hamlets CCGs;

Waltham Forest CCG is responsible for commissioning of health services for the local population of some 271,000 people; Newham CCG for 347,996 people and Tower Hamlets CCG for 304,000 people

Across WEL the individual CCG remains accountable for meeting their statutory duties and there is a robust governance process to ensure that all collaborative commissioning process is carried out effectively.

WEL Collaborative takes modern slavery very seriously as a safeguarding issue and unlawful activity. The CCGs' 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 Director of Quality and Safety is the CCGs' executive lead for safeguarding and has responsibility for providing leadership and gaining assurance in relation to safeguarding issues within the CCGs and locality. The CCGs employ the expertise of Designated Professionals for both children and adults through collaborative arrangements. These roles are an integral part of the CCGs' activity and support the delivery of the safeguarding adult and children agenda.

Each CCG expects commissioned organisations and other companies it engages with to ensure their goods, materials and labour-related supply chains fully comply with the Modern Slavery Act 2015 and are transparent, accountable and auditable.

Policies and Procedures:

Our CCGs' recruitment and selection processes are robust and support managers to adhere to safe and fair recruitment principles. All CCGs comply fully with the NHS Employment Check Standards and the Disclosure & Barring Service (DBS) Code of practice.

The WEL Collaboration: NHS Waltham Forest CCG, NHS Newham CCG, NHS Tower Hamlets CCG

CCGs' policies such as Safeguarding Adults and Children policy, Harassment and Bullying policy, Grievance policy provides an additional platform for employees to raise concerns about poor and inappropriate working practices.

The procurement approach follows the Crown Commercial Service standard. When procuring goods and services, CCGs 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.

Our Approach:

Our overall approach is to be governed by compliance with legislative and regulatory requirements and the maintenance and development of good practice in the fields of contracting and employment.

Review and effectiveness:

Our CCGs will continue to work with our partner agencies to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the supply chains of the providers. The CCGs 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.
- Gaining assurance that all commissioned services have access to training on how to identify those who are victims of modern slavery and human trafficking.
- Work with NHS funded and partner organisations to ensure modern slavery and human trafficking are appropriately prioritised and feature prominently in safeguarding work plans.

In 2019/20, we will continue to raise awareness of the Modern Slavery Act 2015 across the borough partnerships and as part of our procurement approach we will emphasise that providers should be able to demonstrate their compliance with the requirements of the Modern Slavery Act 2015.

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.



Selina Douglas
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NHS Waltham Forest, Newham and Tower Hamlets CCGs