**Modern Slavery & Human Trafficking Statement NHS South Sefton Clinical Commissioning Group**

The Modern Slavery Act 2015 introduced changes in UK law focused on increasing transparency in supply chains, to ensure that supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking). As both a local leader in commissioning health care services for the population of South Sefton and as an employer, NHS South Sefton Clinical Commissioning Group provides the following statement to provide assurance of its commitment to, and efforts to, prevent slavery and human trafficking practices in the supply chain and employment practices.

**Our Organisation**

As an authorised statutory body, the CCG is responsible for commissioning health care services covering a population in excess of 150,000. Please see the CCG vision and values via link:[**https://www.southseftonccg.nhs.uk/about-us/our-vision-and-values/**](https://www.southseftonccg.nhs.uk/about-us/our-vision-and-values/)

**Our commitment to prevent slavery and human trafficking**

The Governing Body, Senior Leadership Team and all employees are committed to ensuring that there is no modern slavery or human trafficking in any part of our business activity.

**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.

**Our policies, arrangements and due diligence processes**

Our recruitment processes are highly mature – requiring practices that adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records/ DBS checks. This safe recruitment principle is supported by a Recruitment and Selection policy.

Our policies such as Harassment and Bullying policy, Equality and Diversity policy and Whistleblowing policy provide an additional platform for our employees to raise concerns about poor working practices.

Any identified concerns regarding Modern Slavery and Human Trafficking would be escalated as part of the organisational safeguarding processes and in conjunction with partner agencies such as the Local Authority and Police.

Contracting with providers is a core function of the CCG. All of our contracting and commissioning staff are suitably qualified and experienced in managing healthcare contracts and receive appropriate briefing on the requirements of the Modern Slavery Act 2015.

Our Safeguarding, Human Resources policies and mandatory safeguarding training provide guidance in relation to managing potential cases of slavery and human trafficking for employees and provide a platform for our employees to raise concerns about poor and inappropriate working practices.

**Procurement**

The CCG ensures that organisations commissioned to provide services have appropriate systems that safeguard children in line with section 11 of the Children Act (2004), and adults in line The Mental Capacity Act 2005, The Care Act 2014 and The Modern Slavery Act 2015. With regards specifically to the Modern Slavery Act 2015, there is a specific question in our standard set in the pre-qualification questionnaire so that we can be assured of the approach of potential providers at the outset of procurement. 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 of 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’

Further, under SC32 Safety and Safeguarding there is a requirement upon all of our providers to have in place programmes for safeguarding and to co-operate with the Commissioner in pursuance of these.

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 including a specific mandatory question in respect of compliance with the annual reporting contained within Section 54 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 financial year ending 31st March 2022.

Jane Lunt

Interim Chief Nurse