

Meeting of Governing Body

Date: Tuesday 4th December 2018

Time: 1.30pm

Location: The Vassall Centre, Gill Avenue, Downend, BS16 2QQ

Agenda number: 9.2

Report title: Modern Slavery Statement

Report Author: Paulette Nuttall, Head of Safeguarding Adults

Report Sponsor: Anne Morris, Director of Nursing and Quality

1. Introduction

The attached paper has been prepared for Governing body approval to ensure that Bristol, North Somerset, South Gloucestershire Clinical Commissioning Group (BNSSG CCG) comply with the legislative requirement for the publication of the Modern Slavery and Human Trafficking Statement (2015) to be published on the CCG website.

2. Executive Summary

Modern Slavery (2015)

Compliance with Section 54 of the Modern Slavery Act (2015) supply chain requires companies to publish annual 'transparency in supply chain' statements (Section 54) explaining what action, if any, they are taking to understand and tackle this abuse. The basic requirements to undertake this are that:

- Statements should be approved by the board of directors – this ensures boards are seriously discussing the issues
- Statements should be signed by a director – this ensures there is clear accountability within the business on modern slavery
- Statements should be linked to the company's homepage – this ensures other stakeholders, including investors, workers and consumers, can scrutinise business action on slavery

Failure to comply with Section 54 not only demonstrates a lack of due diligence with regard to business regulation but also a failure to take this abuse of human beings seriously. UK's Independent Anti-Slavery Commissioner

3. Recommendations

The Governing Body is asked

- To note the content of the statement
- To approve the attached Modern Slavery Statement for publication on the CCG website.

4. Financial resource implications

There are no direct financial implications arising from this paper

5. Legal implications

The CCG is required under section 54 of the Modern Slavery Act (2015) to publish a modern slavery statement on its website. Failure to publish a statement can lead to an injunction that compels the organisation to report

6. Risk implications

There are reputational risk implications and a potential lack of confidence for the CCG arising from the CCG supply chain business if the CCG and its supply chain businesses do not comply with the modern slavery act (2015). Internal audit and regular review is required to ensure that supply chain business is complying with the requirements of the Modern Slavery Act (2015).

7. Implications for health inequalities

There are implications for health inequalities where compliance with employment law is poor and people can be exploited through modern slavery and human trafficking to deliver contracts

8. Implications for equalities (Black and Other Minority Ethnic/Disability/Age Issues)

There are implications for inequalities for the CCG arising from modern slavery and human trafficking if supply chain business exploit labour to deliver contracts that are mitigated through risk assessment and compliance with employment law.

9. Implications for Public Involvement

The CCG is required to publish their Modern Slavery Statement on the CCG public website.

Modern Slavery Statement for publication on Bristol, North Somerset, South Gloucestershire Clinical Commissioning Group (BNSSG CCG) website 'About Us' section

November 2018

Modern Slavery and Human Trafficking Statement

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, which focus on increasing transparency in supply chains.

As both a local leader in commissioning health care services for the population of Bristol, North Somerset and South Gloucestershire (BNSSG) and as an employer, BNSSG Clinical Commissioning Group (the 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.

Our organisation

As an authorised statutory body, the CCG is the lead commissioner for health care services (including acute, community, mental health and learning disability services) in the BNSSG area – covering a population in excess of 900,000.

Our commitment to prevent slavery and human trafficking

The Governing Body, Executive Management Team, commissioners and all employees 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 receive mandatory safeguarding training which includes awareness around Modern Slavery.

During 2019-21 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.

Our 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 including Safeguarding Adults and Children policies, Bullying and Harassment policy, Grievance procedure and Raising a Concern policy provide additional platforms for our employees to raise concerns about poor and/or 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. In 2019-21 the CCG will commit to:

- Continuing to provide expert support and advice, via CCG Designated Safeguarding Leads, into the commissioning process and supporting multi-agency work to respond to modern slavery and human trafficking.
- Continuing to gain assurance that all commissioned services have access to training around identifying 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.
- Continuing to work with NHS funded and partner organisations to ensure modern slavery and human trafficking are appropriately prioritised and feature prominently in safeguarding work plans.



Anne Morris
Director of Nursing & Quality