

Modern slavery statement

1. The Modern Slavery Act 2015 introduced changes in UK law, focused on increasing transparency in supply chains. Specifically, large businesses are now required to disclose the steps they have taken to ensure their business and supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking).

2. Commercial organisations that supply goods or services and have a minimum turnover of £36 million are required to produce a 'slavery and human trafficking statement' each financial year. This should set out the steps (if any) taken to ensure modern slavery is not taking place in the organisation's own business and its supply chains. It needs to be approved at Board level, signed by a Director and published in a prominent place on the organisation's website.

3. As a commissioner of health and care services for patients across Hammersmith and Fulham 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.

4. Our Organisation

4.1 As an authorised statutory body, Hammersmith and Fulham CCG is the lead commissioner for health care services (including acute, community, mental health) in the borough of Hammersmith and Fulham.

5. Our commitment to prevent slavery and human trafficking

5.1 The Governing Body, Senior Management Team 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.

6. Our approach

6.1 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.

7. Our policies and arrangements

7.1 Our recruitment processes are robust – requiring practices that adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records.

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

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

8. Review of effectiveness

- 8.1 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 2017/18, our anti-slavery programme will also:
 - Support our staff to understand and respond to modern slavery and human trafficking, and the impact that each and every individual working in the NHS can have in keeping present and potential future victims of modern slavery and human trafficking safe.
 - Ensure that all NHS staff members have access to training on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information and will help staff develop the skills to support individuals who come into contact with health services
 - Work with NHS funded organisations to ensure modern slavery and human trafficking are taken seriously and features prominently in safeguarding work plans.
 - Review CCG safeguarding policy to ensure that Modern Slavery and Human Trafficking are integral within the content and staff are directed to support and advice as needed.

9. Contracting with providers is a core function of the CCG.

9.1 All of our contracting and commissioning staff are suitably qualified and experienced in managing healthcare contracts and will receive appropriate briefing on the requirements of the Modern Slavery Act 2015 (the Act).

9.2 During 2017/18 we will write to all providers requesting evidence of their plans and arrangements to prevent slavery in their activities and supply chain.

9.3 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 2018.