

## **Modern Slavery Statement 2018/19**

1. As a commissioner of health and care services for clients across Hammersmith and Fulham we are committed to supporting the Governments objective to eradicate modern slavery and human trafficking and recognise the significant role that the NHS has in combatting and support victims of modern slavery and human trafficking. We provide the following statement in respect of its commitment to, and efforts to, identify, support and prevent slavery/human trafficking in the supply chain and employment practices to ensure that modern slavery and human trafficking cannot flourish.

2. 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).

3. 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.

### **4. Our Organisation**

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

4.2 Hammersmith and Fulham CCG is committed to work in partnership with our multi-agency partners to develop effective actions in the Borough against modern slavery and human trafficking.

## **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 Safeguarding, Bullying and Harassment, Grievance and Whistleblowing policies provide an additional advice and support platform for our employees to identify modern slavery and human trafficking and 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 non-clinical 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 2018/19, our anti-slavery/human trafficking 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.

8.2 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 identify and support individuals who come into contact with health services

8.3 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.

9.2 During 2018/19 we will write to all providers requesting evidence of their plans and arrangements to prevent modern slavery and human trafficking 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 modern slavery and human trafficking statement for the financial year ending 31st March 2019.