

## **Modern Slavery Statement 2021 - 2022**

1. 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 2021.

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. As both a local leader in commissioning health care services for the population of Nottingham and Nottinghamshire, and as an employer, the Nottingham & Nottinghamshire Clinical Commissioning Group 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.

### **5. Our Organisation**

5.1 As an authorised statutory body, the CCGs are the lead commissioners for health care services (including acute, community, mental health) across Nottingham and Nottinghamshire – covering a population in excess of 1.1 million.

### **6. Our Commitment to Prevent Slavery and Human Trafficking**

6.1 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.

### **7. Our Approach**

7.1 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.

### **8. Our Policies and Arrangements**

8.1 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.

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

8.3 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.

## **9. Review of effectiveness**

9.1 In 2020/21, our Adult Safeguarding Work plan will:

- 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 assurance is sought evidencing that all NHS staff has access to training on how to identify those who are a victim of modern slavery and human trafficking.

## **10. Contracting with Providers is a core function of the CCG.**

10.1 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.

10.2 During 2021/22 we will gain assurance from providers by requesting evidence of their plans and arrangements to prevent slavery in their activities and supply chain where appropriate.