

## **NHS Dorset Clinical Commissioning Group's response to the requirements of the Modern Slavery Act 2015**

This statement comprises the Modern-Day Slavery and Human Trafficking statement of NHS Dorset Clinical Commissioning Group (the organisation) for the financial year ending 31st March 2020 in accordance with **Section 54, Part 6 of the Modern Slavery Act 2015**.

The organisation recognises that it has a responsibility to take a robust approach to Modern Day Slavery and Human Trafficking and is absolutely committed to its prevention within all corporate activities.

### **1. Definition of Offences**

#### **Modern Day Slavery, Servitude, Forced or compulsory labour.**

1.1 A person commits an offence if;

I. The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude,

or;

II. The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

### **2. Human Trafficking**

2.1 A person commits an offence if;

I. The person arranges or facilitates the travel of another person (victim) with a view to being exploited.

II. It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

### **3. Exploitation**

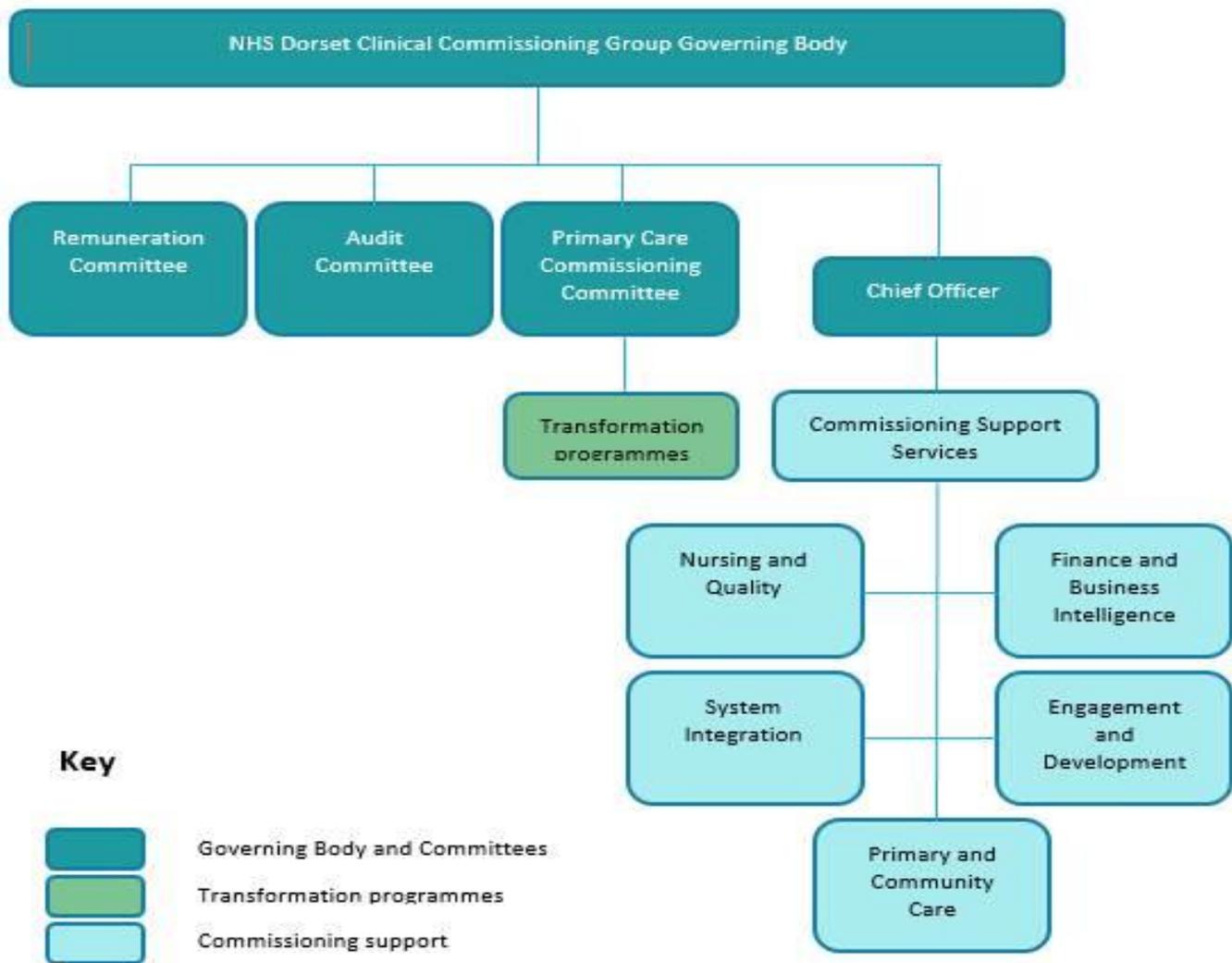
- 3.1 A person is exploited if one or more of the following issues are identified in relation to the victim;
- I. Slavery, servitude, forced or compulsory labour.
  - II. Sexual exploitation
  - III. Removal of organs
  - IV. Securing services by force, threats and deception
  - V. Securing services from children, young people and vulnerable persons.

### **4. Organisational Structure**

- 4.1 NHS Dorset Clinical Commissioning Group (CCG) as of 22<sup>nd</sup> April 2020 comprises of 18 Primary Care Networks across Dorset.
- 4.2 NHS Dorset CCG recognises safeguarding as a high priority for their organisation. In order to achieve this we ensure we have arrangements in place to provide strong leadership, vision and direction for safeguarding. We make sure we have clear accessible policies and procedures in line with relevant legislation, statutory guidance and best practice.
- 4.3 We have a clear line of accountability for safeguarding within NHS Dorset CCG. An Accountable Officer and Executive Lead for Safeguarding are in place, and responsibility for Safeguarding Children and Adults at risk is within the portfolio of the Director of Quality and Nursing. The Designated nurses for Safeguarding Children and the Adult Safeguarding Lead are an integral part of CCG activity. NHS Dorset 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 with The Care Act (2014), The Mental Capacity Act (2005), and The Modern Slavery Act (2015).

### **5. The Organisational Structure, Business and Supply Chain**

- 5.1 The diagram below describes the organisational governance structure that supports the delivery of the safeguarding adult and children agenda within the CCG. The Accountable Officer and or the Executive Lead for safeguarding attend all of the committees below:



## **6. Procurement**

6.1 The CCG's Procurement Policy and Principles will be updated to include a commitment to the CCG's obligations under the Act and to action it intends to take in its Procurement Process.

6.2 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'*

6.3 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.

## **7. The Policies in Relation to Slavery and Human Trafficking**

7.1 Human Trafficking and Modern slavery guidance is included in the CCG's Safeguarding Policies.

7.2 The response to Human Trafficking and Modern Slavery is coordinated under the Pan Dorset Community Safety Partnership process.

## **8. The Due Diligence processes in relation to Modern Slavery and human trafficking in its Business and Supply Chains**

8.1 We are committed to ensuring that there is no Modern Slavery or Human Trafficking in our supply chains or in any part of our business.

8.2 The CCG adheres to the National NHS Employment Checks/Standards. This includes employees UK address, right to work in the UK and suitable references.

8.3 We have in place systems to encourage the reporting of concerns and the protection of whistle blowers. Where possible we build long standing relationships with our Providers and make clear our expectations of business behaviour. With regards to national or international supply chains, we expect these entities to have suitable anti-slavery and human trafficking policies and processes in place.

**9. The parts of its business and supply chains, where there is a risk of Modern Slavery and Human Trafficking taking place, and the steps it has taken to assess and manage that Risk**

9.1 The CCG is committed to social and environmental responsibility and has zero tolerance for Modern Slavery and Human Trafficking. Any identified concerns regarding Modern Slavery and Human Trafficking would be escalated as part of the organisational safeguarding process and in conjunction with partner agencies; such as the Local Authority and Police.

**10. The effectiveness in ensuring that Modern Slavery and Human Trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considered appropriate.**

10.1 The CCG aims to be as effective as possible in ensuring that Modern Slavery and Human Trafficking is not taking place in any part of our business or supply chains:

- I. Liaison with Safeguarding Leads within Provider services and Dorset and BCP Councils to identify safeguarding referrals pertaining to modern slavery and the outcomes of investigations undertaken.
- II. NHS employment checks and payroll systems (i.e. people bought into the country illegally will not have a National Insurance number).
- III. Level of communication with our commissioned providers in the supply chain and their understanding of, and compliance with, our expectations in relation to the NHS terms and conditions. These conditions relate to issues such as bribery, slavery and other ethical considerations.

**11. Training about Modern Slavery and Human Trafficking is Available to its Staff**

11.1 Reference is currently made to Modern Slavery and Human Trafficking within the organisation's Mandatory Safeguarding Children and Adult training programmes and is compliant with the recommendations in the *Safeguarding Child and Young People: Roles*

*and competences for Health Care Staff; Intercollegiate Document.  
Third Edition; March 2014.*

**This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our organisation's modern slavery and human trafficking statement for the current financial year.**

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