

## South East London Clinical Commissioning Group (CCG): Statement on modern slavery and human trafficking

NHS South East London Clinical Commissioning Group fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role the NHS has to play in combatting it and supporting victims. The CCG is fully committed to complying with The Modern Slavery Act 2015.

### **The Offence:**

*Slavery, servitude and forced or compulsory labour*

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.

### **Human Trafficking:**

A person commits an offence if:

- i. The person arranges or facilitates the travel of another person (victim) with a view to the victim being exploited;
- ii. It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

### **Exploitation:**

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.

### **Our Organisation**

The CCG is made up of all GP surgeries across South East London. The organisation is responsible for commissioning (planning, monitoring and paying for) most of the health services for residents of the South East London.

## **How we ensure compliance**

The CCG is strongly committed to ensuring its supply chains and business activities are free from ethical and labour standards abuses. The organisation's overall approach is governed by compliance with legislative and regulatory requirements and development and implementation of best practice in employment and commissioning processes. The CCG:

- Adheres to London Safeguarding Adults Multi-Agency Policies and Procedures and London Child Protection Procedure, which include modern slavery and safeguarding trafficked and exploited children. The CCG works closely with the Safeguarding Board to ensure that these policies are implemented by partner organisations in Southwark. The CCG's Safeguarding Policy is up-to-date and makes specific reference to Modern Slavery and Human Trafficking
- Adheres to safe recruitment practices and confirms the identities of all new employees and their right to work in the United Kingdom and checks for criminal history as appropriate to roles. We pay all employees above the National Living Wage
- has systems in place to encourage the reporting of concerns by staff and protection of whistleblowers
- Expects the organisations it commissions and its supply chains to comply with The Modern Slavery Act 2015 by having appropriate anti-slavery policies and processes in place. The CCG uses its contractual agreements and regular assurance meetings with these organisations to monitor how they fulfil safeguarding responsibilities, including modern slavery.

## **Review of effectiveness**

The CCG intends to continue to work with the Safeguarding Board and partner organisations to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking. The CCG will:

- Support its 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
- Work with the local NHS organisations to ensure modern slavery and human trafficking are taken seriously and features prominently in their safeguarding agendas.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

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