

## **NHS Hull Clinical Commissioning Group (CCG) response to the requirements of the Modern Slavery Act 2015**

This statement comprises the Modern Day Slavery and Human Trafficking statement of NHS Hull CCG (the organisation) for the financial year ending 31 March 2021 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 Hull CCG is a clinically-led organisation that brings together 37 local GP practices and other health professionals to plan and design services to meet local patients' needs. Our GP practices served a registered patient population of 301,151 (at 29 May 2019) across 23 local authority wards during 2019-20. For more information on the CCG please see the latest published Annual Report and Accounts at [www.hullccg.nhs.uk](http://www.hullccg.nhs.uk)
- 4.2 NHS Hull 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 Hull 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/professionals for safeguarding children and adults are an integral part of CCG activity. NHS Hull 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 Policies in Relation to Slavery and Human Trafficking**

5.1 Human Trafficking and Modern slavery guidance is included in the CCG's Safeguarding Policies <https://www.hullccg.nhs.uk/policies/clinical-commissioning-policies/a-z-of-policies/>

5.2 The response to Human Trafficking and Modern Slavery is coordinated through membership of the Hull Safeguarding Adults Partnership Board, Hull Safeguarding Children's Partnership, Hull Community Safety Partnership and Humber Modern Slavery Partnership.

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

6.1 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.

6.2 The CCG adheres to the National NHS Employment Checks/Standards. This includes employees UK address, right to work in the UK and suitable references [here](#)

6.3 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.

## **7. 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**

7.1 The CCG is committed to preventing and tackling modern slavery in all its forms. 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 [here](#)

## **8. 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**

9.1 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 Hull Local Authority 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.

## **10. Training about Modern Slavery and Human Trafficking is available to CCG staff**

10.1 Modern Slavery and Human Trafficking is currently included within the organisation's mandatory safeguarding children and adult training programme for all staff, and is compliant with the recommendations in the Safeguarding Child and Young People: Roles and competencies for Health Care Staff; Intercollegiate document. Third Edition; March

2019 and Adult Safeguarding: Roles and Competencies for Health Care Staff Intercollegiate document. First edition: August 2018

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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