

BSW CCG MODERN SLAVERY STATEMENT – End of 2022/23 Financial Year

INTRODUCTION

This statement is made in pursuant to section 54(1) of the Modern Slavery Act, 2015. It sets out BaNES, Swindon and Wiltshire (BSW) Clinical Commissioning Groups (CCG) commitment to tackling modern slavery and human trafficking in all its activities and its supply chains and the steps BSW CCG is taking to make sure modern slavery or human trafficking is not taking place within our business or supply chain during the year end 31 March 2023.

The Modern Slavery Act 2015 refers to the offences of human trafficking, slavery, servitude and forced or compulsory labour, including sexual or criminal exploitation. NHS England have defined modern slavery as the recruitment, movement, harbouring or receiving of children, women, or men through the use of force, coercion, deception and through the abuse of an individual's vulnerability or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.

OUR COMMITMENT TO PREVENT MODERN SLAVERY AND HUMAN TRAFFICKING

BSW CCG is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. We are committed to continuous improvement in our systems, processes, and policies. We are committed to supporting and safeguarding any individual who we believe is at risk of modern slavery or human trafficking.

As with all NHS organisations BSW CCG has a statutory duty under the Modern Slavery Act 2015 to cooperate with reporting cases of trafficking / modern day Slavery in line with the statutory requirements of the Modern Slavery Act.

OUR POLICIES

PROCUREMENT & CONTRACTING

BSW CCG is bound by the Public Contracts Regulations 2015 (PCRs) as well as the CCG's Standard Financial Instructions (SFIs) and the BSW CCG Procurement Policy for procurement.

Our procurement processes ensure that:

- Our supplies are carefully selected through our robust supplier selection criteria/processes
- The main contractor provides details of its material sub-contractor(s) to enable the CCG to check their suitability
- Invitation to tender documents contain a clause on human rights issues and equal opportunities

- Contract documents contain clauses giving the lead supplier/commissioner the right to terminate a contract for failure to comply with labour laws
- Our suppliers are carefully selected through our robust supplier selection criteria/processes, including use of the Cabinet Office Standard Selection Questionnaire where appropriate.

Providers are monitored via the NHS Standard Contract, NHS Terms and Conditions for the Supply of Services, or other approved contract form which require providers to comply with relevant legislation.

HUMAN RESOURCES

We operate several internal policies to ensure we are conducting business in an ethical and transparent manner.

These include:

- a) Recruitment Policy. We operate a robust recruitment policy, including eligibility to work in the UK checks for all directly employed staff, bank staff and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained, to safeguard against human trafficking or individuals being forced to work against their will. We pay all our employees above the National Living Wage.
- b) Equal Opportunities. We have a range of controls to protect staff from poor treatment and/or exploitation that comply with all respective laws and regulations.
- c) Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people receiving services are being treated, or about poor working practices within our business or supply chain.
- d) Staff Code of Conduct- our core values are:
 - e) Caring
 - f) Collaborative
 - g) Inclusive
 - h) Accountable
 - i) Innovative
- j) Supervision – we expect line managers to meet with their staff regularly to review progress, identify issues that may have arisen within or outside work and to agree how to address them
- k) Staff well-being at work – we provide an employee assistance programme in order that staff can raise confidential matters requiring counselling support or welfare/legal support.

OPERATIONAL

Advice and training about modern slavery and human trafficking is available to staff through our statutory and mandatory safeguarding training. Our training complies with both the intercollegiate documents for Safeguarding Adults and Children and Core Skills for Health.

All staff are required to complete Level 1 as a minimum which outlines key information and duties in relation to modern slavery and human trafficking.

Further advice is available for all staff at the following websites:

Adults: Modern Day Slavery Helpline:

<https://www.modernslaveryhelpline.org>

Tel: 08000 121 700

Children: NSPCC Child Trafficking Advice Centre (CTAC)

Tel: 0808 800 5000

<https://www.nspcc.org.uk/services-and-resources/services-for-children-and-families/childtrafficking-advice-centre-ctac>

Our Organisation has a strong safeguarding governance structure for both Adults, Children and Children Looked after. The Director of Nursing and Quality for BSW CCG is the Nominated Executive Officer for Safeguarding for the Trust. There are Operational and Clinical Leads for Safeguarding Children and Adults in the organisation. The structure includes Designated Professionals, Named GP's, and specialist nurses for safeguarding available for advice on concerns regarding individuals who may be at risk of exploitation, servitude or forced labour. We provide assurance both internally and externally to the Trust. The Governing Body receives regular updates on safeguarding children and adults. BSW CCG also produces Safeguarding Annual Reports, and we are a member of local Multi-Agency Safeguarding Adults and Children's Boards.