

# **Basildon and Brentwood Clinical Commissioning Group**

## **Modern Slavery Act (2015) Statement 2018/19**

As both a local leader in commissioning health care services for the population of Basildon & Brentwood and as an employer, Basildon & Brentwood Clinical Commissioning Group (the CCG) 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.

## **Definition of Offences**

### **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;

- I. If 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.

### **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**

As an authorised statutory body, the CCG is the lead commissioner for health care services (including acute and community) in the Basildon & Brentwood area – covering a population in excess of 260,000. We are an NHS organisation with over 76 employees and a budget in 2018/19 of in excess of £355 million.

### **Our commitment to prevent slavery and human trafficking**

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 hold our suppliers to account to do likewise.

Our Human Resources Policies for staff include Dignity and Respect at Work and Grievance Procedure, additionally, since the introduction of the Public Interest Disclosure Act 1998 (PIDA), whistle-blowers have been legally protected when making public interest disclosures. The CCG notes that whistleblowing is an

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important part of CCG clinical governance and patient safety systems, with direct implications for patient safety outcomes. The CCG has a Whistleblowing and Concerns Policy to support staff to raise concerns, and where relevant provide protection under the Public Interest Disclosure Act (1998). The policy states that staff must not suffer any detrimental treatment as a result of raising a concern in good faith, in accordance with the Public Interest Disclosure Act 1998.

Our safeguarding Adults Policy highlights modern slavery and human trafficking as a form of abuse and this is included in staff training.

### **Our approach**

Our overall approach will be governed by compliance with legislative and regulatory requirements and the maintenance and development of best practice in the fields of contracting and employment.

### **Our plans and arrangements**

Our recruitment processes are highly mature – requiring practices that adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records. Our pay structure is derived from national collective agreements and is based on equal pay principles with rates of pay that are nationally determined. Our Remuneration Committee holds the organisation to account in adhering to these standards.

The CCG will continue to raise awareness of the Modern Slavery Act 2015 internally and as part of all procurement processes

Contracting with providers is a core function of the CCG. All of our contracting staff are suitably qualified and experienced in managing healthcare contracts and will receive appropriate briefing on the requirements of the Modern Slavery Act 2015 (the Act).

The CCG, in line with due diligence and best practice, only commission/procure services from reputable sources and these processes are subject to thorough assessment and monitoring in line with national standards.

The CCG will continue to monitor all commissioned provider services to ensure that there is full compliance with the national requirement of the Modern Slavery Act 2015 and their compliance with the mandatory safeguarding staff training. This will provide assurances that their staff are alert to and know how to report all types of abuse.

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 31 March 2019.



**Lisa Allen**  
Interim Accountable Officer