

**NHS HARDWICK CCG MODERN SLAVERY ACT &
HUMAN TRAFFICKING STATEMENT 2017**

NHS Hardwick Clinical Commissioning Group (the "CCG") is an NHS organisation set up by the Health and Social Care Act 2012 to organise the delivery of NHS services in England. The CCG:

1. is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of public funds and the management of its activities;
2. adopts zero tolerance to corruption and bribery and this policy is endorsed by our Governing Body; and
3. fully support the government's objectives to eradicate modern slavery and human trafficking;
4. call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

Our annual report will provide information to supplement this statement, including details of our activities and supply chains and actions we are taking to support the government.

Signed by:

Chair: 

Chief Officer: 

NHS HARDWICK CCG

MODERN SLAVERY ACT & HUMAN TRAFFICKING COMMITMENT 2017

NHS Hardwick Clinical Commissioning Group (the “CCG”) is an NHS organisation set up by the Health and Social Care Act 2012 to organise the delivery of NHS services in England. The CCG:

1. engages with a large number of private and public sector organisations in pursuit of its regulatory priorities and investment, procurement and commissioning activities;
2. activities are usually undertaken at arms-length and take place solely in England. The CCG’s priority is to support local Health Providers through effective commissioning using key delivery partners in the public and private sector;
3. also undertake activities by partnering with local authorities, local Healthwatch and the third sector, and where appropriate will undertake direct development using approved agencies procured for that purpose.

Supply Chain Policy

1. The CCG’s procurement activities take place in England; and its contractors and suppliers are predominantly UK and EU based.
2. The CCG uses competitive procurements, all expenditure is by Purchase Order only:
 - up to £14,999 (Delegated Budget Holder);
 - from £15,000 to £49,999 (competitive quotations from at least 3 source);
 - from £50,000 to £113,057 (formal tendering process);
 - £113,057 and above (EC tendering limit: OJEU procurement process to be applied).
3. The CCG places general reliance upon its internal structure for its operationally-focused services.
4. In the CCG’s own right it maintains a number of legal, commissioning related UK procurement standards.
5. The CCG’s commissioning powers enable its clients to draw-down professional multi-disciplinary services and development expertise. This includes the services of private public and third sector agencies, with their associated goods, services and labour-related supply chains.
6. The CCG do not maintain a goods, materials or direct-labour supply chain Framework.
7. The CCG expect commissioned organisations and other companies it engages with to ensure their goods, materials and labour-related supply chains:
 - fully comply with the Modern Slavery Act 2015;
 - are transparent, accountable and auditable; and
 - are free from ethical ambiguities.

8. Through this commitment the CCG encourage commissioned organisations and other companies it engages with to read and apply as appropriate the 'Transparency in Supply Chains Consultation Document (Feb 2015) and Government Response (July2015)' – <https://www.gov.uk/government/consultations/modern-slavery-and-supply-chains>
9. Individuals with evidence of non-compliance with the Modern Slavery Act 2015 in connection with the CCG's supply chains are encouraged to follow the reporting procedure outlined below:

Children and young people under 18 years

- For concerns about a child or young adult, follow all child protection guidelines and speak to the designated Child Protection Lead. Please note that health professionals have a legal obligation to safeguard children that present to them.
- For out of hours, contact the Local Children's Social Services or police service, specifically highlighting your concern for child trafficking.
- Consider referral to your hospital paediatric team for admission.

Adults

- Contact the Salvation Army 24-hour confidential helpline for professional advice and support and referrals on 0300 303 8151, operating 7 days a week.
- Only make referrals if the person is able to give consent and has agreed to the referral.
- Consider using maternity services to admit pregnant women for observation.
- In any circumstance informing the CCGs in the first instance.

Steps to take from January 2017 – Year 1

1. Management responsibility and general awareness

The CCG will:

- agree management responsibility for the statement and this commitment, and seek endorsement from the Executive Management Team and Governing Body;
- raise general organisational awareness by circulating a briefing paper on Modern Slavery and its impact on the health sector;
- encourage staff to participate in training available at no cost.

2. Risk assessment

The CCG will:

- undertake an assessment using our professional legal, risk and procurement teams to determine our risk exposure;
- established that our primary risk is association with a Delivery Partner, Framework participant or Carry out 'due diligence' with any organisation/company with an ambiguous or non-compliant supply chain, if and when needed;

- included the Modern Slavery Act 2015 within our statutory and regulatory Compliance Risk Register to ensure the risk continues to be flagged, assessed and appropriately addressed.

3. Risk mitigation

The CCG will:

- add a provision to its tender documentation which includes the mandatory exclusion of any bidder who has been convicted of an offence under section 1, 2 or 4 of the Modern Slavery Act 2015. The CCG fully supports the Government's objectives to eradicate modern slavery and human trafficking and will exclude any bidder who has been convicted of an offence under section 1, 2 or 4 of the Modern Slavery Act 2015;
- obtain legal advice and seek to impose in new contracts that it enters into provisions for termination in the event of a modern slavery or human trafficking compliance breach by the supplier, if and when required.

Steps to take – Year 2

1. Management responsibility and general awareness

The CCG will:

- report progress to the Executive Management Team and Governing Body;
- raise awareness of this published statement by notifying organisations that it regularly engages;
- prepare an annual statement.

2. Risk assessment

The CCG will commence a review exercise of the statement and commitment against its activities to establish whether the approach the CCG has taken follows emerging best practice by:

- assessing and interpreting any recent or emerging case law and best practice;
- benchmarking its activities against statements and action plans undertaken by similar public and private organisations; and
- re-evaluating the risk of non-compliance as part of its cyclical Compliance Risk Register assessment.

3. Risk mitigation

We will:

- act promptly where a compliance breach has been identified or flagged; and
- continue to feedback lessons learnt into the compliance risk management process.

This commitment is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes NHS Hardwick CCG Modern Slavery and Human Trafficking Statement for the year

beginning January 2017. Thereafter to be produced within our annual reporting cycle starting 31 March 2017

NHS Hardwick CCG

Date: 31 January 2017