

Modern Slavery and Human Trafficking Statement in line with Section 54 of the Modern Slavery Act 2015

1. Background and Purpose

Modern slavery is 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.

The Modern Slavery Act 2015 introduced changes in UK law, focused on increasing transparency in supply chains. Specifically, large businesses are now required to disclose the steps they have taken to ensure their business and supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking).

As an NHS community provider CSH Surrey provides the following statement in respect of its commitment to, and efforts in, preventing slavery and human trafficking practices in its supply chain and employment practices.

2. Our Organisation

CSH Surrey is an organisation set up by the Health and Social Care Act 2012 to organise the delivery of NHS services in England. The organisation is Surrey's largest and longest established NHS community services provider. It has been running NHS health services in the homes, clinics, hospitals and schools of Surrey since 2006. CSH Surrey is one of the 11 health and social care providers who are known as the Surrey Heartlands Health and Care Partnership and are working together to improve care across Surrey Downs, North West Surrey and Guildford & Waverley areas.

CSH Surrey is commissioned to provide community services across Surrey and has a statutory duty under the Modern Slavery Act 2015 to cooperate with reporting cases of trafficking / modern slavery in line with the statutory requirements of the Modern Slavery Act.

CSH Surrey's vision is to be a 'pioneering and innovative organisation that empowers our c1500 staff to consistently deliver exceptional care for a healthier community'.

Within CSH Surrey, strong partnerships – inside and out – and motivated staff drive the delivery of better care. CSH Surrey is a values-driven, people business with a passion for quality and innovation. As a not-for-profit social enterprise, CSH Surrey exists to benefit its local communities and any surplus is re-invested back into improving services and into local communities through its Community Fund.

Safeguarding and improving the wellbeing of our population is central to our values and principles.

3. Our commitment to Prevent Slavery and Human Trafficking

The CSH Surrey Executive Management Team and all staff 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 to holding our suppliers to account to do likewise.

4. Our approach

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

All of CSH Surrey staff have mandatory safeguarding training which includes awareness on Modern Slavery and our clinical staff attend mandatory level 3 face-to-face training (Workshop to Raise Awareness of Prevent (WRAP) training).

CSH Surrey safeguarding policies and training provision assists professionals to identify and take appropriate action where concerns about modern day slavery and exploitation arise. Further detail is available on our website: <http://intranet/safeguarding/Pages/Modern-Day-Slavery.aspx>

A range of resources and information on modern slavery or human trafficking is available to our staff on the CSH Surrey intranet under safeguarding and the CSH Surrey safeguarding team are available for advice and support for staff who are concerned.

5. Our Policies and Arrangements

CSH Surrey is aware of our responsibilities towards patients, their families, carers, its staff and the local community and expect all partner suppliers to the organisation to adhere to the same ethical principles. 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. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships.

Currently all awarded suppliers sign up to our terms and conditions of contract which contain a provision around Good Industry Practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains; and that they conduct their businesses in a manner that is consistent with CSH Surrey's anti-slavery policy. In addition, an increasing number of suppliers are implementing the Labour Standards Assurance System (LSAS) as a condition of contract for tenders within high risk sectors and product categories and indeed this has been referenced in the Government's Modern Slavery Strategy. Many aspects of the LSAS align to the seven reporting areas that the Government has outlined and should appear within any slavery and human trafficking statement.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. Our policies such as: Safeguarding Adults and Children Policies, Bullying and Harassment Policy and Procedure, Grievance procedure and Whistleblowing policy and procedure (Raising concerns) provide an additional platform for our staff to raise concerns about poor working practices.

CSH Surrey is a partner in Surrey Safeguarding Boards (adults and children). CSH Surrey safeguarding team work across the partnership to safeguard children and adults, strengthening our collective response to modern day slavery and child sexual exploitation.

All professionals that come into contact with adults and children in their everyday work need to be able to identify those who may have been trafficked and be competent to know how to act to support and protect them from harm.

Our recruitment processes are robust and adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records.

CSH Surrey is bound by the NHS Terms and Conditions for procurement and is monitored via the NHS Standard Contract, which require providers to comply with relevant legislation.

In addition, CSH Surrey has specific quality standards in place regarding safeguarding. This includes but is not limited to:

- Safe recruitment standards
- Training that includes Modern Slavery, Trafficking and Child Sexual Exploitation
- Policies to support effective safeguarding practice
- Leadership within the service for safeguarding children and adults

The CSH Surrey safeguarding team supports and assures that all of our NHS commissioned services to have effective safeguarding arrangements in place, including their responses to risks of Modern Slavery.

6. Our approach to procurement and our supply chain includes:

Ensuring that our suppliers are carefully selected through our robust supplier selection criteria/processes - see below;

- Requiring that the main contractor provides details of its sub-contractor(s) to enable CSH Surrey to check their credentials
- Randomly request that the main contractor provide details of its supply chain
- Ensuring invitation to tender documents contain a clause on human rights issues
- Ensuring invitation to tender documents also contains clauses giving CSH Surrey the right to terminate a contract for failure to comply with labour laws

CSH Surrey staff must contact and work with the Procurement department when looking to work with new suppliers so appropriate checks can be undertaken.

Supplier adherence to our values. We are zero tolerant to slavery and human trafficking and thereby expect all our direct and indirect suppliers/contractors to follow suit.

Where it is verified that a subcontractor has breached the child labour laws or human trafficking, then this subcontractor will be excluded in accordance with Regulation 57 of the Public Contracts Regulations 2015. CSH Surrey will require that the main contractor substitute a new subcontractor.

The Procurement team ensures that due diligence is undertaken for all new and ongoing suppliers of goods and services to the organisation and their associated Supply Chains by sourcing through the following complaint routes:

1. Competitive Partnership Procurement Procedures are in compliance with EU guidance, which requires suppliers to confirm they comply with the Modern slavery act. To support partnerships proposals, suppliers are required to respond to bids with information on:

- (a) the organisation's structure, its business and its supply chains;
- (b) Its policies in relation to slavery and human trafficking;
- (c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- (d) the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
- (e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
- (f) the training about slavery and human trafficking available to its staff.

2. Procurement through national government frameworks

3. All contracts and associated purchase orders are raised on the CSH Surrey Terms and Conditions which are based on NHS standard Terms and Conditions which suppliers are mandated to comply with. These conditions state that:

10.1.28 it shall: (i) comply with all relevant law and guidance and shall use Good Industry Practice to ensure that there is no slavery or human trafficking in its supply chains; (ii) notify the organisation immediately if it becomes aware of any actual or suspected incidents of slavery or human trafficking in its supply chains;

10.1.29 it shall at all times conduct its business in a manner that is consistent with any anti-slavery Policy of the Organisation and shall provide to the Organisation any reports or other information that the Organisation may request as evidence of the suppliers compliance with this clause 10.1.29 and/or as may be requested or otherwise required by the Organisation in accordance with its anti-slavery Policy.

The Procurement team upholds the Chartered Institute of Procurement and Supply (CIPS) Code of Professional Conduct.

7. Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from our staff, patients, their families, carers (the public), or law enforcement agencies to indicate that modern slavery practices have been identified.

8. Review of Effectiveness

CSH Surrey will continue to highlight the issue of modern slavery and human trafficking with our staff across the organisation and to ensure our staff identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in the provision of our services and contracts.

The CSH Surrey Director of Nursing & Quality is the executive lead for safeguarding, supported by the Head of Safeguarding and Professional Standards and her team who provide expert support and advice to the CSH Surrey Board, managers and frontline staff regarding the need to respond to concerns about modern slavery and human trafficking.

CSH Surrey will continue to provide assurance to our commissioners/CCG and the public that our staff are confident and competent in recognising such abusive situations and reporting their concerns via the statutory safeguarding services or the National Referral Mechanism.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking statement for the financial year ending 31st March 2021.

Executive Director of Safeguarding Approval for this Statement

The CSH Surrey Joint Safeguarding meeting members have considered and approved this statement and will continue to support the requirements of the legislation.

Signed by: 

Date: 24 June 2020