

Slavery and Human Trafficking Statement 2018

South Eastern Hampshire & Fareham and Gosport Clinical Commissioning Groups fully support the Government's objective to eradicate modern slavery and human trafficking and recognises the significant role the NHS has to play in both combatting it and supporting victims.

In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses. Steps taken to date include:

- We confirm the identities of all new employees and their right to work in the United Kingdom, and pay all our employees above the National Living Wage.
- Our Human Resources Policies for staff include Dignity and Respect at Work and Grievance Procedure.
- Although the five Hampshire CCGs are not currently a prescribed organisation under the Public Interest Disclosure Act (1998), in 2013 NHS England advised CCG Clinical Leaders and Accountable Officers that since the introduction of the Public Interest Disclosure Act 1998 (PIDA), whistle-blowers have been legally protected when making public interest disclosures. It notes that whistleblowing is an important part of CCG clinical governance and patient safety systems, with direct implications for patient safety outcomes. The five Hampshire CCGs have Whistleblowing and Concerns Policies to support staff to raise concerns, and where relevant provide protection under the Public Interest Disclosure Act (1998). The policies state 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).
- When procuring goods and services, we additionally apply NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with relevant legislation.
- Our safeguarding Adults Policy highlights modern slavery and human trafficking as a form of abuse and this is included in staff training.
- We are engaged in the Hampshire multiagency partnership for Modern Slavery and Human Trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Fareham and Gosport and South Eastern Hampshire CCG Proposed Actions for 2018-2019

- During 2018 and 2019 we will work with our commissioned providers meeting the annual financial threshold to monitor compliance with the Act using our Clinical Quality Review Meeting mechanism. The CCGs will ensure that all commissioned services meeting the financial threshold are aware of their duties under the Act. We will also monitor continual improvements sought via the Clinical Quality Review Mechanisms in relation to compliance with the annual statement and its publication. We will also include improvement requirements within the quality schedules for large NHS providers of care.
- During 2018 and 2019 our Quality Team will ensure that where the CCGs commissions care in the nursing and residential sectors, the independent hospital sector, and other services, that where they meet the stated financial threshold, the provider of care is aware of their duties and an annual statement published.
- During 2018 and 2019 we will work with partner CCGs and our procurement services to ensure modern slavery is comprehensively covered, particularly in any areas of potentially heightened concern. This will reduce duplication where multiple CCGs commission services from a provider. This will be led by procurement services and commissioners of NHS healthcare.
- During 2018 and 2019 Quality Managers will review the Standard NHS Contract and consider where we can make this more robust to drive improvements within providers of NHS care.
- We will continue an active role on the Hampshire Multi-agency Modern Slavery Partnership.