

## **Modern Slavery Act 2015 Statement**

### **What is modern slavery?**

Slavery is a violation of a person's human rights. It can take the form of human trafficking, forced labour, bonded labour, forced or servile marriage, descent-based slavery and domestic slavery. A person is considered to be in modern slavery if they are:

- Forced to work through mental or physical threat
- Owned or controlled by an "employer", usually through mental or physical abuse
- Dehumanised, treated as a commodity or sold or bought as "property"
- Physically constrained or has restrictions placed on their freedom of movement

### **The use of slavery in the production of goods and services**

Typically, products bought have passed through a long chain of producers, manufacturers, distributors and retailers who have all participated in its production, delivery and sale. It can therefore be very difficult to certify that a product has or has not been produced using slavery. However, the way in which companies operate and manage their supply chain can affect the likelihood of slavery being a part of the final product. The Modern Slavery Act 2015 places responsibility on organisations to ensure that no slavery has occurred, and this applies not only to the products they sell or the services they provide themselves but also to their suppliers, and the suppliers of their suppliers, all the way along the supply chain.

### **What we are required to do**

Primarily, NHS Chorley and South Ribble CCG and NHS Greater Preston CCGs' requirements relate to section 54 of the Act -- "transparency in the supply chain". Under the Modern Slavery Act 2015, any company with a turnover of more than £36m must produce a statement for each financial year listing the steps it is taking to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business. This statement must be published on company websites and visible to staff, suppliers, customers and investors.

### **Our statement of principles**

*"NHS Chorley and South Ribble CCG and NHS Greater Preston CCG believe there is no room in our society for modern slavery and human trafficking. We have zero tolerance for modern slavery and breaches in human rights and will ensure this is built into the processes and business practices that we, our partners and our suppliers use".*

### **Our approach**

#### **What we already do**

- We ensure all UK workers receive minimum wage and conduct robust immigration checks
- We ensure suppliers adhere to the Working Time Directive 1998

- We provide safeguarding training to employees and local suppliers; we will extend this to include modern slavery risks and compliance
- All of our staff can access specific Modern Slavery Act online training

### **What we will do next**

- We will continue to review our commissioning cycle for opportunities to ensure a robust approach
- We will work with new and existing suppliers to ensure that they sign up to our supplier code of conduct
- We will continue to work with our supply chain partners to ensure that modern slavery is not present in the supply chain, and we want all our suppliers to think about the steps they can take to provide us with the assurance that:
  - Modern slavery is not present in their company
  - There are safe and fair working conditions for staff
  - The risks within their own supply chain are understood
  - There is responsible management and compliance with all legal requirements, reflected in policies, procedures, practices and in contracts with suppliers
- We will contact suppliers to carry out audits as part of our supplier management, focusing closely on those we consider to be at greatest risk, including those who:
  - Operate by employing casual or temporary labour
  - Operate outside the UK/EU
  - Manufacture or trade in raw material outside the UK/EU
  - Have a strategic exposure with NHS Chorley and South Ribble CCG and NHS Greater Preston CCG and our service users
- We will include Modern Slavery Act 2015 requirements as part of our Equality and Inclusion Team's annual compliance checks for suppliers who meet the £36M turnover threshold
- We will review our approach each year and publish an annual statement outlining the steps we are taking to tackle modern slavery