

**NHS North East Lincolnshire Clinical Commissioning Group (NELCCG) and North East Lincolnshire Council (NELC) response to the requirements of the Modern Slavery Act 2015**

This statement comprises the Modern-Day Slavery and Human Trafficking statement of NELCCG and NELC for the financial year ending 31 March 2023 in accordance with Section 54, Part 6 of the Modern Slavery Act 2015. Both organisations work within North East Lincolnshire, which has an estimated population of 159 364 individuals. It is estimated that roughly 4% of North East Lincolnshire's population are not UK nationals.

The Modern Slavery Act 2015 has introduced changes in UK law focused on increasing transparency in employment practices, to ensure these are free from modern slavery (that is, slavery, servitude, forced and compulsory labour, human trafficking and exploitation).

As local leaders in commissioning and provision of health and care services for the population of North East Lincolnshire (NEL), and as employers ourselves, NELCCG and NELC provide the following statement to offer assurance of their commitment and efforts to prevent slavery and human trafficking practices. The organisation recognises it has a responsibility to take a robust approach to modern day slavery and human trafficking and is absolutely committed to its prevention within all corporate activities.

## **Part 1: Definition of Offences**

**1.1 Modern Day Slavery, Servitude, Forced or compulsory labour:** A person commits an offence if -

- 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.
- 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.

**1.2 Human Trafficking:** A person commits an offence if -

- The person arranges or facilitates the travel of another person (victim) with a view to being exploited.
- It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

**1.3 Exploitation:** A person is exploited if one or more of the following issues are identified in relation to the victim –

- Slavery, servitude, forced or compulsory labour.

- Sexual exploitation
- Removal of organs
- Securing services by force, threats and deception
- Securing services from children, young people and vulnerable persons.

## **Part 2: Organisational Structure**

- 2.1** As authorised statutory bodies, both NELCCG and NELC are commissioners (NELCCG and NELC) and providers (NELC) for health and care services, including mental health services, acute, community, primary and social care services in the North East Lincolnshire area, covering a population of roughly 160,000.

Please see the NELCCG and NELC vision and aims via the following link:

<http://www.northeastlincolnshireCCG and NELC.nhs.uk/our-aims/>

<https://www.nelincs.gov.uk/your-council/north-east-lincolnshire-council-vision-and-aims/>

- 2.2** NELCCG and NELC recognises safeguarding as a high priority for their organisation. In order to achieve this we ensure we have arrangements in place to provide strong leadership, vision and direction for safeguarding. We make sure we have clear accessible policies and procedures in line with relevant legislation, statutory guidance and best practice.
- 2.3** We have a clear line of accountability for safeguarding within NELCCG and NELC. NELCCG ensures that organisations commissioned to provide services have appropriate systems that safeguard children in line with section 11 of the Children Act (2004), and adults in line with The Care Act (2014), The Mental Capacity Act (2005), and The Modern Slavery Act (2015).

## **Part 3: Policies and Arrangements**

- 3.1** Our recruitment processes are highly mature – requiring operational practice that adheres to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records/ DBS checks. This safe recruitment principle is supported by Recruitment and Selection policy.
- 3.2** Our policies such as Bullying and Harassment at Work policy, Equality and Diversity policy and Whistleblowing policy provide an additional platform for our employees to raise concerns about poor working practices. Information about these can be found here: [Equality & diversity • NHS North East Lincolnshire CCG ; Publications • NHS North East Lincolnshire CCG; Equality and diversity - NELC | NELC \(nelincs.gov.uk\)](#)

- 3.3 Our Multi-agency Safeguarding policies and procedures also provide guidance in relation to managing potential cases of slavery and human trafficking for employees. Our safeguarding policy and procedures can be accessed here: [Safeguarding • NHS North East Lincolnshire CCG; SaferNEL | SaferNEL](#)
- 3.4 Policies in relation to Slavery and Human Trafficking are included in NELCCG's Safeguarding Policies and can be accessed here: [Safeguarding • NHS North East Lincolnshire CCG; SaferNEL | SaferNEL](#)

#### **Part 4: The Due Diligence processes in relation to Modern Slavery and human trafficking in its Business and Supply Chains**

- 4.1 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. NELCCG and NELC adheres to appropriate employment checks and standards, all of which is outlined in our Recruitment and Selection Policy. This includes obtaining relevant information to confirm employees UK address, their right to work in the UK and suitable references.
- 4.2 We have in place systems to encourage the reporting of concerns and the protection of whistle blowers (Can be accessed here: [Publications • NHS North East Lincolnshire CCG](#))
- 4.3 Where possible we build long standing relationships with our Providers and make clear our expectations of business behaviour.
- 4.4 With regards to national or international supply chains; we expect these entities to have suitable anti-slavery and human trafficking policies and processes in place.

#### **Part 5: The parts of its business and supply chains, where there is a risk of Modern Slavery and Human Trafficking taking place, and the steps it has taken to assess and manage that risk**

- 5.1 NELCCG and NELC is committed to preventing and tackling modern slavery in all its forms. Any identified concerns regarding Modern Slavery and Human Trafficking would be escalated as part of the organisational safeguarding process and in conjunction with partner agencies; such as the Local Authority and Police. We are member of the HMSP so are part of a robust multi-agency partnership which can support in dealing with concerns and offer wrap-around care for potential victims.
- 5.2 The CCG procurement approach follows the Crown Commercial Service standard. NELC use a standard selection questionnaire. When procuring non-clinical goods and services, the CCG applies NHS Terms and Conditions and utilises the NHS Standard Contract for all clinical procurement. NELC have standard terms and conditions that goods, services and work

providers are expected to self-assess against to ensure they are compliant. Both require suppliers to comply with relevant legislation.

- 5.3 During 2021-22, we will continue to raise awareness of the Modern Slavery Act 2015 internally and as part of all procurement processes, we will request all providers to set out evidence of their plans and arrangements to prevent slavery in their activities and supply chain.

**Part 6: The effectiveness in ensuring that Modern Slavery and Human Trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considered appropriate**

- 6.1 The CCG aims to be as effective as possible in ensuring modern slavery, human trafficking and exploitation is not taking place in any part of our business or supply chains by:
- Liaison with Safeguarding Leads within Provider services and Hull Local Authority to identify safeguarding referrals pertaining to modern slavery and the outcomes of investigations undertaken.
  - Employment checks and payroll systems (i.e. people bought into the country illegally will not have a National Insurance number).
  - Level of communication with our commissioned providers in the supply chain and their understanding of, and compliance with, our expectations in relation to the NHS and NELC terms and conditions. These conditions relate to issues such as bribery, slavery and other ethical considerations.
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**Part 7: Training about Modern Slavery and Human Trafficking is available to NELCCG and NELC staff**

- 7.1 Modern Slavery and Human Trafficking is currently included within the organisation's mandatory safeguarding children and adult training programme for all staff, and is compliant with the recommendations in the Safeguarding Child and Young People: Roles and competencies for Health Care Staff; Intercollegiate document. Third Edition; March 2019 and Adult Safeguarding: Roles and Competencies for Health Care Staff Intercollegiate document. First edition: August 2018.



**North East Lincolnshire**  
Clinical Commissioning Group

**This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our organisation's modern slavery and human trafficking statement for the current financial year.**

**Signed:** Jan Haxby

Handwritten signature of Jan Haxby in black ink.

Director of Quality and Nursing, NEL  
CCG

Date: 12.04.2022

**Signed:** Bev Compton

Handwritten signature of Bev Compton in black ink.

Director of Adult Social Services, NELC

Date: 19.04.2022

**Signed:** Joanne Hewson

Handwritten signature of Joanne Hewson in black ink.

Director of Children Social Services, NELC

Date: 12.04.2022

**NEXT REVIEW:** March 2023