

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introduction from the Governing Body

NHS Heywood, Middleton and Rochdale Clinical Commissioning Group are committed to improving our practices to combat slavery and human trafficking.

The Modern Slavery Act 2015 has introduced changes in UK law focused on increasing transparency in supply chains, to ensure our supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking). As both a local leader in commissioning health care services for the population of Heywood, Middleton and Rochdale Borough and as an employer, NHS Heywood, Middleton and Rochdale Clinical Commissioning Group (the CCG) provides the following statement in respect of its commitment to, and efforts in, preventing slavery and human trafficking practices in the supply chain and employment practices.

### Organisations Structure

As an authorised statutory body, the CCG is the lead commissioner for health care services (including acute, community, mental health) in the Heywood, Middleton and Rochdale area – covering a population in excess of 235,000.

Our values are:

- **No decision about me, without me**, applicable to all stakeholders
- **Care and Compassion** in everything we do
- Being **honest, open and visible**
- Providing constructive challenge and being **open to challenge**
- Being **bold, radical innovative and aspirational**

### Our commitment to prevent slavery and human trafficking

The Governing Body, Executive Management Team, Member Practices and all employees 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.

### 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.

### **Our policies and arrangements**

Our recruitment processes are highly mature – requiring practices that adhere to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records.

Our policies such as Bullying and Harassment at Work policy, Individual Grievance policy, Equality and Diversity policy and Whistleblowing policy provide an additional platform for our employees to raise concerns about poor working practices

Our procurement approach follows the Crown Commercial Service standard.

When procuring goods and services, we 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.

During 2019/20, 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.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2019.

Signed



**Steve Rumbelow - Accountable Officer**  
**NHS Heywood, Middleton and Rochdale CCG**

**Dr Chris Duffy - Chair**