

Our Slavery and Human Trafficking Statement

About Us

NHS Luton Clinical Commissioning Group (CCG) is led by doctors and nurses and other healthcare professionals. Each of the 28 GP practices in Luton is a member and provides local health knowledge and experience. In this way, we can act together to commission services more effectively.

In 2013 the CCG took over many of the responsibilities that were previously performed by the Primary Care Trust, NHS Luton. We plan, organise and purchase NHS funded health care for the people of Luton. This includes hospital services, community health services (such as district nursing, health visiting and various therapies) and mental health services.

The CCG fully supports the Government's objectives 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:

People

- 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 Respect at Work, Grievance and Voicing your Concerns for Staff policies additionally give a platform for our employees to raise concerns about poor working practices.
- Awareness is raised through training for CCG staff and all health providers are encouraged to do the same and ensure that all front line practitioners are aware of and able to respond to incidents of modern slavery within care settings.

Whistleblowing in the NHS

- Staff are made aware LCCG policy on the Staff Making Concerns Known (whistle blowing) – Public Disclosure Act 1998. We assign any concerns for further investigation and offer support to individuals that have suffered fiscal or professional detriment as a result of whistleblowing

Procurement and our supply chain

- Our procurement approach follows the Crown Commercial Service standard and includes a mandatory exclusion question regarding the Modern Slavery Act 2015.
- 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.

- To date all Commercial and Procurement staffs have received training on ethical and labour issues in procurement. Ethical and labour issues form a key part of our induction for new entrants to the Commercial team.
- LCCG Business Case approval process now includes a question on Social Value which must be considered before the budget for a proposed procurement is approved. This question is supported by explanatory narrative, which makes direct references to labour rights and the Modern Slavery Act.

Review of effectiveness

We intend to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in our supply chains.

Our anti-slavery programme will also:

- support our staff to understand and respond to modern slavery and human trafficking, and the impact that each and every individual working in the NHS can have in keeping present and potential future victims of modern slavery and human trafficking safe;
- ensure that all NHS staff have access to training on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information and will help staff develop the skills to support individuals who come into contact with health services;
- work with NHS funded organisations to ensure modern slavery and human trafficking are taken seriously and features prominently in safeguarding work plans; and
- review all NHS England safeguarding policies and MAST training to ensure that Modern Slavery and human trafficking are integral within the content and staff are directed to support and advice as need.

Further details can be found

at:<https://www.england.nhs.uk/ourwork/safeguarding/our-work/modern-slavery>

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to NHS Luton Clinical Commissioning Group.