



**NHS**  
**Brent**  
**Clinical Commissioning Group**

Brent CCG Modern Slavery Act and Human Trafficking Statement and Commitment  
2018-2019

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

NHS Brent Clinical Commissioning Group (CCG) acts as the commissioner for the local NHS providers (including hospital, community and mental health services) 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.

#### **Our Organisation**

NHS Brent CCG is a clinically led statutory NHS body responsible for the planning and purchasing (commissioning) many of the health services needed by the 370,000 people registered with GPs in Brent. We are made up of all 62 GP practices in the borough and our member practices have organised themselves into four commissioning localities.

Link to Brent CCG vision <http://brentccg.nhs.uk/en/about-us/our-vision>

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

Modern 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

#### **Our commitment to prevent modern slavery and human trafficking**

Our overall approach will be governed by compliance with legislative and regulatory requirements and the maintenance and development of best practice in the fields of contracting and employment and we will:

- Review our commissioning cycle for opportunities to ensure a robust approach.
- Continue to ensure that our recruitment processes are adhering to safe recruitment principles. This includes strict requirements in respect of identity checks, work permits and criminal records.


- The Governing Body, Senior Management Team and all employees are committed to ensuring there is no modern slavery or human trafficking in any part of our business activities and also hold our providers to account. Brent CCG ensure robust systems and processes are in place that enables assurance to be sought. This includes detailed contracts in respect of the service specification and provider's duties in adhering to the Modern Slavery Act 2015.
- Brent CCG recognises safeguarding is a priority for the organisation. We ensure arrangements are in place to provide strong leadership, vision and direction for safeguarding. This includes accessible policies and procedures in line with relevant legislations, statutory guidance and best practice.

### **Policies and arrangements**

Human Trafficking and Modern Slavery procedures are referenced in NHS Brent CCG Safeguarding Children and Adults at Risk Policies. The response to Human Trafficking and Modern Slavery is coordinated under the safeguarding adult and /or safeguarding children's processes.

During 2018/19, we will continue to raise awareness and offer training 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.



Signature:

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NHS Brent CCG



Signature:

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Commissioning Groups (NWL CCGs)