MODERN SLAVERY STATEMENT – End of 2018/19 Financial Year

INTRODUCTION

This statement is made in pursuant to section 54(1) of the Modern Slavery Act, 2015. It sets out CNWL’s commitment to tackling modern slavery and human trafficking in all its activities and its supply chains and the steps CNWL is taking to make sure modern slavery or human trafficking is not taking place within our business or supply chain during the year end 31st March 2019.

Section 54 of the Act specifically addresses the point about transparency in the supply chains. It states that a commercial organisation (defined as a supplier of goods or services with a total turnover of not less than £36million per year) shall prepare a written slavery and human trafficking statement for the financial year. The statement should include the steps an organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of the supply chain or its business. The statement must be approved by the Board of Directors.

The Modern Slavery Act 2015 refers to the offences of human trafficking, slavery, servitude and forced or compulsory labour, including sexual or criminal exploitation. NHS England have defined modern slavery as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, deception and through the abuse of an individual’s vulnerability or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.

ABOUT THE ORGANISATION

CNWL is a large community facing Trust, caring for people with a wide range of physical and mental health needs. Our purpose is to provide integrated health and social care services for a population of around three million people living in the South East of England, including London, Surrey, Milton Keynes and Buckinghamshire. The Trust's annual turnover from continuing activities for 2018/19 was £487million.

During 2018/19 we provided care to around 320,000 people living in some of the wealthiest and the most deprived areas in England, with widely varying available investment in health and social care. To do this work, we employ nearly 7,127 staff who provide around 300 services, mostly in the community – in people’s own homes, community clinics and schools. Much of this is in partnership with other organisations. We also have a number of specialist units for inpatients when intensive treatment is needed. Healthcare is also provided within prisons, young offenders’ institutions and immigration removal centres.

OUR COMMITMENT TO PREVENT MODERN SLAVERY AND HUMAN TRAFFICKING

CNWL are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. We are committed to continuous improvement in our systems, processes and policies. We are committed to supporting and safeguarding any individual who we believe is at risk of modern slavery or human trafficking.
As with all NHS organisations CNWL has a statutory duty under the Modern Slavery Act 2015 to cooperate with reporting cases of trafficking / modern day Slavery in line with the statutory requirements of the Modern Slavery Act

OUR POLICIES

PROCUREMENT

CNWL is bound by the NHS Terms and Conditions for procurement and are monitored via the NHS Standard Contract, which require providers to comply with relevant legislation.

Our procurement processes ensure that:

- Our supplies are carefully selected through our robust supplier selection criteria/processes
- The main contractor provides details of its sub-contractor(s) to enable the Trust to check their credentials
- Invitation to tender documents contain a clause on human rights issues and equal opportunities
- Invitation to tender documents contain clauses giving the Trust the right to terminate a contract for failure to comply with labour laws

Trust staff must contact and work with the Procurement department when looking to work with new suppliers so appropriate checks can be undertaken.

HUMAN RESOURCES

We operate a number of internal policies to ensure we are conducting business in an ethical and transparent manner. These include:

a) Recruitment Policy. We operate a robust recruitment policy, including eligibility to work in the UK checks for all directly employed staff, bank staff and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained, to safeguard against human trafficking or individuals being forced to work against their will. We pay all our employees above the National Living Wage.

b) Equal Opportunities. We have a range of controls to protect staff from poor treatment and/or exploitation that comply with all respective laws and regulations.

c) Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people receiving services are being treated, or about poor working practices within our business or supply chain.

d) Staff Code of Conduct.

e) Supervision – we expect line managers to meet with their staff regularly to review progress, identify issues that may have arisen within or outside work and to agree how to address them

f) Staff well-being at work – we provide an employee assistance programme in order that staff can raise confidential matters requiring counselling support or welfare/legal support.
OPERATIONAL

Advice and training about modern slavery and human trafficking is available to staff through our statutory and mandatory safeguarding training. Our training complies with both the intercollegiate documents for Safeguarding Adults and Children and Core Skills for Health. All staff are required to complete Level 1 as a minimum which outlines key information and duties in relation to modern slavery and human trafficking. All clinical staff are required to undertake Level 2/Level 3 training.

Further advice is available for all staff at the following websites:

Adults: Modern Day Slavery Helpline and website can be accessed via: https://www.modernslaveryhelpline.org
Tel: 08000 121 700

Children: NSPCC Child Trafficking Advice Centre (CTAC) Tel: 0808 800 5000
https://www.nspcc.org.uk/services-and-resources/services-for-children-and-families/child-trafficking-advice-centre-ctac

Our Organisation has a strong safeguarding governance structure for both Adults and Children. The Executive Director of Nursing & Quality for CNWL is the Nominated Executive Officer for Safeguarding for the Trust and there is an Associate Director of Quality, Safeguarding and Safety for CNWL. There are Operational and Clinical Leads for Safeguarding Children and Adults in the organisation. The structure also includes Named Professionals and Named Doctors for safeguarding children and Safeguarding and Mental Capacity Act Specialists for Adults across the 3 Divisions of the Trust. These staff are available for advice on concerns regarding individuals who may be at risk of exploitation, servitude or forced labour.

We provide assurance both internally and externally to the Trust. The Board of Directors receive regular updates on safeguarding children and adults. CNWL also produces Safeguarding Annual Reports. CNWL has provided assurance to commissioners and Clinical Commissioning Groups (CCGs) that our staff fulfil their statutory duty to identify and report concerns about suspected cases of modern slavery or human trafficking and we are a member of local Multi-Agency Safeguarding Adults and Children’s Boards.

We are planning to identify a Lead for Modern Slavery and Human Trafficking within the Trust during 2018/19 and develop bespoke training for corporate staff in Procurement and Human Resources on the implications of the Act in order that they can support the wider organisation on its implementation. We continue to support and improve our staff’s knowledge and skills to support individuals at risk of exploitation, servitude or forced labour who come into contact with health services.

OUR PERFORMANCE INDICATORS

We monitor all individual incidents via our Incident Reporting Electronic System (Datix) and Safeguarding reports which highlight types of abuse including Modern Slavery.

We will monitor the effectiveness of the steps we have taken through investigating any reports that modern slavery practices have been identified in our business or any of our supply chains and take immediate action as this would be a breach of the law.
Our Internal Audit Committee is used to review our systems and processes to ensure that they are legally compliant and provide assurance to the Board.

APPROVAL FOR THIS STATEMENT

This statement was presented to the Board of Directors on 8th May 2019

Name (CEO):

Signature:

Date: