

## Modern Slavery and Human Trafficking Statement – 2018/ 19 financial year

### Overview

The Modern Slavery Act 2015 requires all organisations commissioning, supplying goods or services with a turnover above £36 million to prepare and publish an annual 'Slavery and Human Trafficking Statement'. The statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain.

### What is Modern Slavery?

Modern slavery is in our communities across the West Midlands. It is complex and often under reported. Victims of all ages tend to be controlled and hidden away. It is an international crime. Organised crime groups, which can be small or larger in scale, systematically exploit large groups of individuals by forcing and coercing them into a life of abuse, poverty, humiliation, shame, indignity, degradation, starvation, loss of their own human organs and ultimately, loss of human life.

### About us

Birmingham and Solihull Clinical Commissioning Group became the largest clinically-led commissioning organisation in England on 1 April 2018. We were created following approval by NHS England for a merger between Birmingham CrossCity, Birmingham South Central and Solihull CCGs.

We look after a population of around 1.3 million people and our budget is in excess of £1.8 billion – almost 2% of the total NHS resource. We are a membership organisation, with 177 [GP practices](#), as well as a [clinically-led Governing Body](#).

Our Governing Body regards its statutory responsibility to safeguard children, young people and adults as a major priority for the organisation and for our work with national, regional and local partners.

### Our policy

BSOL CCG will continue to work in partnership with our strategic partners and have been actively engaged in the fight against modern day slavery. We have been the lead author for the *Multi-agency policy and procedure for the protection of people who are suspected of being potential victims of modern slavery and human trafficking*, published on 26<sup>th</sup> January 2018 and continue to be an active member of Regional Modern Slavery and Human Trafficking Board.

In addition, we continue to be active members the [West Midlands Anti-Slavery Network](#). Its primary purpose is to develop a collaborative approach across the region to enable us to

support victims. A number of organisations and local authorities engage with the Network and contribute significantly to the partnership meetings. Through the Network we help deliver national and local plans, the West Midlands Modern Slavery Victims Strategy (published 26<sup>th</sup> January 2018), the [West Midlands Police & Crime Plan 2016-2020](#) and through partnership working, supporting the Chief Executives under the West Midlands Combined Authorities Preventing Violence Against Vulnerable People Board. Further and through collaborative working, we have participated in Modern Slavery Pop Up campaigns, the latest being on the 23<sup>rd</sup> March 2018.

## **Our Supply chain**

Following the CCGs merger, Birmingham and Solihull CCG is a commissioning organisation. We are responsible for planning and commissioning health services for people living in Birmingham and Solihull and work as part of a large, complex system of health and social care which includes local authorities, providers, the independent sector and GP practices.

We are working with Sandwell and West Birmingham CCG to commission health services for people living in West Birmingham, ensuring a single commissioning voice across the city.

Our aim is to develop, shape and improve the health and lives of people living in Birmingham and Solihull. This means:

- Delivering the best outcomes
- Tackling health inequalities
- Meeting the health and wellbeing needs of a diverse population
- Improving services – focusing on effectiveness, safety, quality and patient experience
- Working within a financial sustainable system in Birmingham and Solihull

Birmingham and Solihull CCG aims to commission the highest quality care that is tailored to meet the specific needs of patients and the wider community in the Birmingham and Solihull area. There are a number of dimensions to our mission, which together form the basis of a clear vision for the development of a clinically-led and accountable health commissioning structure for everyone in Birmingham and Solihull.

All health commissioners and providers, including the CCG are required to have effective arrangements in place to safeguard children and adults vulnerable to abuse or neglect and to assure themselves, regulators and their commissioners that these are working.

Our safeguarding vision is to continue to commission services that promote and protect individual human rights, independence and well-being and secure assurances that the child or adult thought to be at risk, stays safe. Therefore one of the aims of our safeguarding strategy includes ensuring processes to protect people who are victims of exploitation, such as child sexual exploitation, modern slavery and human trafficking.

Since 2014, all of our full and short version contracts were moved across to use the [NHS Standard Service Specification](#). This means that any changes made to department of health contracts nationally, are automatically incorporated into future revisions. Safeguarding is contained within section SC32 and providers whether large or small must comply with the respective law and guidance. However, as we have recently formed as a new organisation and

through 2018/19 we will be cross checking with our commissioners and contractors, reporting via the BSOL Committee structures.

In addition, modern slavery is incorporate within NHS safeguarding scope for adults and children, as well as learning and development competencies within intercollegiate competency frameworks for Safeguarding Children and NHS standard contracts.

## **Our procedures and employment**

At the time of writing this statement, we have a number of policies and procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chain. These have rolled over into the new organisation but during 2018, all our policies will be reflective of the new organisation.

The following CCG policies are relevant: -

- Public Protection and Safeguarding Policy
- Policy related to recruitment
- Policy related to Stress Management/Health and Wellbeing Policy;
- Policy related to Bullying and Harassment Policy;
- Grievance Policy;
- Whistle Blowing Policy; and
- Policy and guidance related to professional development reviews

## **Employee and Member Practices**

As a member organisation, we also have a responsibility to ensure that our practices are supported to deliver their safeguarding responsibilities. From a governance point of view, we have done this through do this through Networks e.g. the Practice Safeguarding Network Meetings and giving wider opportunities to attend safeguarding workshops and multi-agency training. BSOL CCG does incorporate Modern Slavery and human trafficking as part our level 1, 2 and 3 training and promotes reporting knowledge, spotting the signs and raising awareness and reporting.

As a new organisation and during 2018 we will be rolling out Networks across the CCG localities and undertaking a revised training needs analysis. The 2018 training needs analysis will include one for internal employees and one for our member practices.

We will also continue to seek to apply educational theoretical models in the work we undertake. BSOL CCG will continue to offer support and advice, and a programme of learning and development. The revised 2018 program will be available from this year's academic annual year cycle. In the meantime, e-learning continues to be available via Health Education England, this is free to access for all NHS email users by logging into the platform and the link is [www.e-lfh.org.uk](http://www.e-lfh.org.uk).

## **Approval process**

12<sup>th</sup> April 2018 – Tabled for approval Birmingham & Solihull CCG Quality & Safety Committee

Approved on 24<sup>th</sup> April 2018 and authorised for publication by the NHS Birmingham & Solihull CCG Quality & Safety Committee on 24<sup>th</sup> April 2018.

Approved on 3<sup>rd</sup> July 2018 and authorised for publication by the NHS Birmingham & Solihull Governing Body on 3<sup>rd</sup> July 2018.

### **Approved by:**

Paul Jennings  
Chief Executive  
NHS Birmingham and Solihull Clinical Commissioning Group