

**Modern Slavery and Human Trafficking Statement for reporting year 2018/2019  
as required by the Modern Slavery and Human Trafficking Act 2015.**

**Definition of Offences**

***Slavery, Servitude and Forced or Compulsory Labour***

A person commits an offence if:

- The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or;
- The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

***Human Trafficking***

A person commits an offence if:

- The person arranges or facilitates the travel of another person (victim) with a view to being exploited.
- It is irrelevant whether the victim consents to travel and whether or not the victim is an adult or a child.

***Exploitation***

A person is exploited if one or more of the following issues are identified in relation to the victim;

- Slavery, servitude, forced or compulsory labour.
- Sexual exploitation
- Removal of organs
- Securing services by force, threats and deception
- Securing services from children, young people and vulnerable persons.

## **Modern Slavery and Human Trafficking Statement**

We are a social enterprise delivering publicly-funded NHS healthcare services for adult and children in the Bristol and South West region. We provide over 40 different services with 3 main contracts – Adult Community Services, Children’s Services and Offender Health and we employ over 1,600 highly-skilled staff to deliver these services.

We strive to make a positive social impact across Bristol and beyond and we are committed to making a long-term difference to the communities we serve, which includes people from many different social and cultural backgrounds from all the diverse neighbourhoods of the city.

In accordance with the Modern Slavery Act 2015, Bristol Community Health CIC (BCH) makes the following statement regarding the steps it is taking in the financial year 2018/2019 to ensure that Modern Slavery i.e. slavery and human trafficking, is not taking place in any part of its own business or any of its supply chains.

BCH is committed to ensuring that there is no Modern Slavery or Human Trafficking in our supply chains or in any part of our business. We are committed to social and environmental responsibility and have zero tolerance for Modern Slavery and Human Trafficking. Any identified concerns regarding Modern Slavery and Human Trafficking are escalated as part of the organisation's safeguarding process working in conjunction with our partner agencies.

### **The policies in relation to slavery and human trafficking**

- Human trafficking and modern slavery guidance is included in BCH’s safeguarding policies.
- Modern slavery is incorporated within BCH’s Safeguarding Adults and Safeguarding Children’s Policies. In addition, modern slavery is covered / referenced within the Safeguarding Children and Adult mandatory training from Levels 1-3, which applies to all staff employed by BCH.
- The response to human trafficking and modern slavery concerns are coordinated under the safeguarding adult and/or safeguarding children process. The Police are the lead agency (a national framework is in place to assist in the formal identification and help to coordinate the referral of victims to appropriate services, known as the National Referral Mechanism).
- The referral process for adults/ children at risk and links to both BCH Safeguarding Adults and Children Board (LSCB/LSAB) are located on the safeguarding section of BCH website.
- BCH has systems and policies in place to encourage the reporting of concerns and the protection of whistle blowers and in addition has dedicated named adult and children’s safeguarding leads plus a dedicated Speaking Up Guardian.

- A review is undertaken of all safeguarding referrals via the BCH incident reporting system and presentation of data is shared at the Quality Governance Board Sub-Committee and Safeguarding Committee.
- BCH Employment Checks ensure that all employment checks are in line with National NHS Employment Checks Standards (which include identification, right to work, qualification and registration and reference checks. BCH also checks all new starters using an ID scanner to further verify the ID documentation.
- In addition, BCH requires all external agency engagements to be made via framework approval supplier who are audited centrally and required to confirm that all staff have been checked for their right to work, identification, qualification and registration in line with NHS employment check standards commensurate to NHS processes.

## **BCH staff**

### **Training**

- Undertake safeguarding training appropriate to their roles and responsibilities, which includes Modern Slavery & Human Trafficking.
- All staff receive a comprehensive induction programme which includes information on, and guidance regarding, slavery and human trafficking.
- Relevant staff are required to familiarise themselves with policies within their areas – i.e. HR

### **Working with Suppliers & Procurement**

- Work with the appointed procurement service, Bristol & Weston NHS Purchasing Consortium when looking to work with new suppliers so appropriate checks relating to modern slavery can be undertaken.
- BCH has a Service Level Agreement with Bristol & Weston NHS Purchasing Consortium to provide both operational and strategic procurement services with a shared Procurement Strategy. Our procurement processes are regularly reviewed to ensure that human trafficking and modern slavery issues are considered and addressed at the earliest stage of any tender, requiring self-certification from potential suppliers that their supply chains comply with the law.
- BCH complies with the Public Contracts Regulations 2015 and we seek to procure goods and services through frameworks endorsed by the Cabinet Office and Department of Health & Social Care, under which suppliers such as Crown Commercial Services and NHS Supply Chain adhere to a code of conduct on forced labour.

- The procurement service's senior team are all Chartered Institute of Purchasing and Supply (CIPS) qualified and uphold the CIPS's code of professional conduct and practice relating to procurement and supply. All members of the procurement team are required to undertake safeguarding training at a level appropriate to their roles and responsibilities.

There are no specific obligations placed on public sector procurers under the Act, albeit there will be an expectation that procurers seek some confirmation that suppliers are complying with their obligations, as applicable.

### **Activities undertaken in 2018/2019**

- Revised the statement.
- Initiated production of a Procurement Policy.
- Initiated production of an Ethics Policy.
- Checked our major suppliers against the Modern Slavery Register – (<https://www.modernslaveryregistry.org/>) which gives details of organisation's public Modern Slavery and Human trafficking statements.
- Reviewed the websites of our major suppliers.
- Written to our major suppliers accounting for the top 30 (by spend value) of our supply chain asking them to provide their own anti-modern slavery statements, including major sub-contractors for both Offender Health and Children's services.
- Instituted a process to ensure all new suppliers are asked about their compliance with the Modern Slavery & Human Trafficking Act 2015.
- Built Modern Slavery awareness into our induction and safeguarding training.
- Audited our policies and website to identify where reference is required to the Modern Slavery & Human trafficking Act 2015.

### **Planned activities for 2019/2020**

- Finalise and publish our Procurement Policy, which will include:
  - Template commercial agreements will be updated by BCH to include an obligation that suppliers will comply with the Act and ensure that their suppliers and sub-contractors will too.
  - The procurement service will identify and prioritise high risk areas in the supply chain utilising guidance and resources as available, especially the Chartered Institute of Purchasing and Supply.
- Finalise and publish our Ethics Policy.
- Complete our review of all significant suppliers regarding their anti-modern slavery.
- Use our internal communications mechanisms to raise awareness of modern slavery among staff.
- Update policies and website in line with requirements set out within the Modern Slavery & Human Trafficking Act 2015, in line with the results of our audit undertaken in 2018/2019.
- Engaging with experts within the field of Modern Slavery & Human Trafficking, to help us assess any potential areas of risk for our organisation.

We will continue to review our policies and procedures to ensure we can identify and address any issues associated with slavery and human trafficking. We are committed to identify, prevent and mitigate any potential or actual risks and will expect all of our staff, our partners and our contractors to implement and enforce effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our organisation or in our supply chains.

We will expect all our Suppliers and Contractors to provide, upon request, evidence to demonstrate compliance with the law and reserve the right to terminate contracts where they are unable to do so within a reasonable timescale.

The BCH Board believes that the organisation is following good practice in implementing steps to prevent slavery and human trafficking.



Julia Clarke  
Chief Executive Officer  
March 2019

Reviewed and approved by the Board of Directors - 08.03.19