

## **Modern Slavery Act 2015 Statement**

### **What is Modern Slavery?**

Slavery is a violation of a person's human rights. It can take the form of human trafficking, forced labour, and 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

### **The use of slavery in the production of goods and services**

Typically the products bought nowadays have passed through a long chain of producers, manufacturers, distributors and retailers who have all participated in its production, delivery and sale. It can therefore be very difficult to certify that a product has or has not been produced using slavery. However, the way in which companies operate and manage their supply chain can affect the likelihood of slavery being a part of the final product. The Modern Slavery Act (2015) gives responsibility to companies for ensuring that no slavery has occurred, and this applies not only to the products they sell or the services they provide themselves but also to their suppliers, and the suppliers of their suppliers, all the way down the supply chain.

### **What we are required to do**

Primarily our requirements relate to section 54 of the Act "Transparency in the supply chain" Under the Act, any company with a turnover of more than £36m must produce a statement for each financial year listing the steps it is taking to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its business. This statement must be published on company/organisational websites and visible to staff, suppliers, customers and investors. The trickle-down effect of the Act will be felt this year as businesses begin to ask more searching questions of their suppliers to seek assurance that they are also taking steps to ensure that their supply chains are free from slavery.

### **Our statement of principles**

*"East Lancashire Clinical Commissioning Group believes there is no room in our society for modern slavery and human trafficking, we have a zero tolerance for modern slavery and breaches in human rights and will ensure this is built into the processes and business practices that we, as partners and our suppliers use".*

### **Our approach**

#### **What we already do**

- Ensure all UK Workers receive minimum wage and robust immigration checks
- Ensure suppliers adhere to the working time directive 1998

- Provide Safeguarding training to employees and local suppliers, we will extend this to include modern slavery risks and compliance

### **What next**

- We will review our commissioning cycle for opportunities to ensure a robust approach
- We will develop a supplier “code of conduct” and ensure distribution to current and potential suppliers
- We will ask all our suppliers to agree to our code of conduct
- In partnership with our supply chain partners to work towards elimination of modern slavery in the supply chain, we would want all our suppliers to think about the steps they can take to provide us with the assurance that;
  - Modern slavery is not present in their company
  - Safe and fair working conditions
  - The risks within their own supply chain are understood
  - Instances are appropriately reported (although this is currently not mandated for health)
  - Zero tolerance, responsible management and compliance with all legal requirements is reflected in policies, procedures, practices and in contracts with suppliers
- We will be contacting suppliers to carry out audits as part of our supplier management, focusing closely on those we consider to be at greatest risk, including those;
  - Who operate by employing casual or temporary labour
  - Operate outside the UK/EU
  - Manufacture or trade in raw material outside the UK/EU
  - With those who M&L CSU and our customers have a strategic exposure
- Each year we will review our approach and Publish an annual statement outlining the steps we are taking to tackle modern slavery.