

Modern Slavery Act 2015 (2018/19 Annual Review)

What is modern slavery?

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

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 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 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

"NHS Midlands and Lancashire CSU 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”.

Derek Kitchen Managing Director

Overview of Midlands and Lancashire CSU

Midlands and Lancashire CSU (MLCSU) was formed in April 2014 as a result of the merger of the former Central Midlands CSU and Staffordshire and Lancashire CSU. MLCSU provides end-to-end commissioning support services to 46 CCGs, representing 1,683 GP Practices and 11.6 million population with a total commissioning budget of £14.9 billion. MLCSU also serves several NHS England Local Offices, Provider Trusts, Local Authorities, out of area CCG's, and other non-NHS customers.

The services provided to our core customers are as follows:

- Business Intelligence and Informatics
- Communication and Engagement
- Corporate Governance and Legal Services
- Financial Services
- Human Resources and Payroll
- Individual Patient Activity/Continuing Healthcare
- Information Management and Technology
- Medicines Management
- Procurement
- Organisational Development
- Provider Relationship and Market Management
- Quality and Performance Management
- Referral Management Services
- Service Transformation
- Strategic Consultancy
- Regional Capacity Management

MLCSU operates over a wide geographical area including Birmingham, Solihull, Walsall, Wolverhampton, Dudley, Sandwell, Staffordshire, Leicestershire, Derby, Worcestershire, Herefordshire, Shropshire, Telford and Wrekin, Cheshire, Merseyside and Lancashire, with main offices located at:

- Kingston House, West Bromwich
- Heron House, Staffordshire
- Jubilee House, Lancashire
- 1829 Building, Chester
- Innovation Park, Liverspool
- St John's House, Leicester
- Cardinal Square, Derby

MLCSU employs around 1,500 staff and is forecast to generate an income of £92.4 million in 2017/18.

MLCSU is one of 5 CSUs nationally. They are non-statutory organisations which are hosted by NHS England and derive their powers to act from delegations of authority to CSU Managing Directors by NHS England.

Our vision developed with our staff and core customers is:

To be pivotal in fully supporting the delivery of major improvements in health and wellbeing

Our mission is to make the CSU:

‘A great place to work, great people to work with, even better tomorrow than we are today’

Our values are:

- Honesty, integrity & transparency in everything we do
- Everyone matters: patients, staff & clients
- Highest quality and excellence in our services
- Working as partners with our clients
- A complete focus on adding value

These are consistent with our statement of principles on Modern Slavery and we are therefore totally committed to taking this forward as outlined below.

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
- All staff can access specific Modern Slavery Act online training
- Our procurement team adhere to the Chartered Institute of Procurement & Supply (CIPS) Code of Conduct

The Procurement teams are all Chartered Institute of Purchasing and Supply (CIPS) or working towards this qualification. As such, they all abide by the CIPS code of professional conduct and have completed a CIPS ethical test which specifically covers modern slavery, this is refreshed on an annual basis.

What next

- We will continue to review our commissioning cycle for opportunities to ensure a robust approach
- We will work with new and existing suppliers to ensure that they sign up to our supplier code of conduct
- We will continue to work with our supply chain partners to ensure that modern slavery is not present in the supply chain, and we want 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
 - 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
- We will include Modern Slavery Act requirements as part of our Equality & Inclusion Teams annual compliance checks for suppliers who meet the £36M turnover threshold
- Each year we will review our approach and publish an annual statement outlining the steps we are taking to tackle modern slavery.

Derek Kitchen Managing Director

3rd April 2018