

Collaborative Procurement Partnership (CPP)

Slavery and Human Trafficking Statement

Version Number	2.0
Statement Reference	ORG005
Risk Priority	Major
Statement Author	David Ayrton, Business Manager (Corporate)
Lead Director	Claire Povey, Director of Business and Performance
Approving Body	CPP Executive Board
Approved Date	21 st September 2022
Issued Date	21 st September 2022
Review Period	12 Months
Target Audience	All Staff
Review Date	21 st September 2023

Revision Status

Each document has an individual record of amendments. The current amendments are listed on this page. A new version of the document should be created by the statement author each time the pages are updated.

Version No	Author	Purpose / Change	Date
1.0	Claire Povey, Director of Business and Performance David Ayrton, Business Manager (Corporate)	Create of standalone statement - separate from Modern Day Slavery Policy Reviewed at SMT 07/07/2021 Approved at Executive Board 21/07/2021	July 2021
2.0	David Ayrton, Business Manager	Review and Recommendation by: - Corporate Sustainability Working Group - HR Business Partner - Local Counter Fraud Specialist Included 'Risk Priority' Major. Update training requirements to reflect mandatory training. Connection to CPP sustainability model. Some minor formatting and amendments throughout.	Sept 2022

Contents		Page
1	Introduction from the Collaborative Procurement Partnership	4
2	Our Organisation	4
3	Our commitment to prevent slavery and human trafficking	4
4	Our approach	4
5	Training	4
6	Our policies and monitoring arrangements	4
7	Going forward	5
8	How to report any suspected Slavery and Human Trafficking	5

Introduction from the Collaborative Procurement Partnership (CPP)

CPP is committed to working with local partners to improve our practice in combatting slavery and human trafficking and to raise awareness, disrupt and respond to modern slavery.

The Modern Slavery Act 2015 introduced changes in UK law focused on increasing transparency in supply chains, to ensure our supply chains are free from modern slavery (that is, slavery, servitude, forced and compulsory labour and human trafficking). As a Category Tower Service Provider for NHS Supply Chain and as an employer, CPP provides the following statement in respect of its commitment to, and efforts in, preventing slavery and human trafficking practices in the supply chain and employment practices.

Our Organisation

As a service provider for NHS Supply Chain, we currently deliver three contracts within the NHS Supply Chain Operating Model. As a commercial procurement company that is wholly owned by 4 NHS trusts our values are at the heart of everything we do.

For further information please see the CPP [website](#).

Our commitment to prevent slavery and human trafficking

CPP Senior Management Team and all our people are committed to ensuring that there is no modern slavery or human trafficking in any part of our business activity and in so far as is possible to holding our suppliers to account to do likewise.

Our approach

Our overall approach will be audited annually by Supply Chain Coordination Limited (SCCL) and by compliance with legislative and regulatory requirements and the maintenance and development of good practice in the fields of contracting and employment.

Training

CPP's Modern Slavery Policy is communicated to all our people on induction and following annual review and Executive approval.

Mandatory training is in place on Modern Day Slavery and Human Trafficking for all staff to complete annually.

There is additional training for those staff most likely to interact with supply chains with a potentially higher risk of encountering modern slavery.

Our policies and monitoring arrangements

Our recruitment processes include strict requirements in respect of identity checks, work permits and criminal records / DBS checks. This safe recruitment principle is supported by a Recruitment and Selection Policy.

Our policies such as, Modern Day Slavery Policy, Grievance Policy, Equality and Diversity and Inclusion Policy and Raising Concerns (Whistleblowing) Policy provide an additional platform for our employees to raise concerns about poor working practices.

Our contract and supplier management process includes an onboarding requirement to check suppliers Modern Slavery Policy and Human Trafficking Statement. CPP will conduct checks on those that fall into high-risk categories. Audit may include but not limited to making enquiries into their operations, how they source labour and materials, the prices they pay to their suppliers further down the supply chain.

The CPP Contract Register and checks against Modern Day Slavery and Human Trafficking will be managed by the Business and Performance Team.

CPPs Sustainability Working Group monitor the effectiveness of this Policy within the organisation and provide input into the annual review and recommendation.

Going Forward

CPP recognises that tackling modern slavery requires a continuing year-on-year commitment and will continue to undertake due diligence in our supply chain and review and improve procedures to help identify and prevent the risks of modern slavery or human trafficking.

CPP will meet this commitment by monitoring employee awareness of this statement and associated policies, acting on annual audit recommendations or otherwise any new legislation, review of any concerns and issues logged throughout the year in connection with this statement.

How to report any suspected Slavery and Human Trafficking

The Director of Business and Performance is the Single Point of Contact for suspected modern slavery issues or any other fraud bribery and corruption issues affecting the organisation.

Staff should report any suspicions in the first instance via any of the following methods:

Telephone – 07980 795312

Email – claire.povey@cpp.nhs.uk

Anonymous reporting facility – CPP Internal Feedback Portal <https://cpp.hive.hr/opendoor-kiosk>