



Modern Slavery Statement 2025

Introduction

NHS Shared Business Services (NHS SBS) fully supports the UK Government's objectives to eradicate Modern Slavery and Human Trafficking.

Modern Slavery and Human Trafficking are a crime and an abuse of human rights. It is imperative that across NHS SBS we embrace the opportunity to address the risks of Modern Slavery and Human Trafficking throughout our business activities.

As a large-scale provider of business services to the NHS, our size, scope, and reach enable NHS SBS to positively influence and educate local, national, and global health-related supply chains to enhance collective Modern Slavery eradication activity with our partners, customers, stakeholders, and suppliers.

This statement outlines the policies, processes, and actions that we have taken to understand the potential impact to NHS SBS from Modern Slavery for the financial year ending 31st December 2025.

It is in accordance with the following legislation and guidance:

- Section 54 of the UK Modern Slavery Act (2015).
- PPN 009 Tackling Modern Slavery in Government Supply Chains.
- Transparency In Supply Chains (TISC): a practical guide, Home Office (updated March 2025).



NHS Shared Business Services will work tirelessly to prevent Modern Slavery and Human Trafficking in our business activities.

We will monitor and develop our supply chains to ensure they are free from Modern Slavery and Human Trafficking

Organisational structure and supply chains

NHS Shared Business Services (NHS SBS) provides essential corporate services to more than 99% of trusts and commissioning organisations across the United Kingdom. Our core services include procurement services, framework agreements, finance and accounting, consulting, employment services, digital transformation, and sustainability and social value, which support the NHS in delivering high-quality patient care efficiently and cost-effectively.

This statement covers the activities of NHS Shared Business Services, a unique joint venture between NHS Business Services Authority (an arm's length body of the Department of Health and Social Care) and digital transformation experts Sopra Steria.

Consequently, NHS Shared Business Services is an independent company with an independent board, which utilises support services from Sopra Steria Limited, who are part of Sopra Steria Holdings and the Sopra Steria Group, based in Paris, France.



At NHS SBS, we operate a comprehensive Sustainability and Social Value Programme known as 'Healthy NHS SBS', which embeds ethical, social, and environmental considerations into our business operations.



Healthy people



Healthy planet



Healthy purpose

NHS SBS's supply chain is predominantly comprised of organisations based across the UK and Europe.

While we recognise that elements of our extended upstream supply chains may reach into regions with a higher inherent risk of modern slavery or human trafficking, we take a proactive and risk-aware approach to managing these complexities. Our active supplier base includes approximately 800 organisations, and we remain committed to working closely with them to promote transparency, ethical practices, and continuous improvement.

We implement a structured and collaborative approach to supplier due diligence, including targeted questionnaires and an annual supplier engagement survey. These mechanisms enable us to build strong partnerships with our suppliers, while gathering robust responsible procurement evidence.

This includes reviewing modern slavery statements and understanding the specific steps suppliers are taking to prevent and address modern slavery within their operations. Where we identify opportunities for improvement—such as statements not fully aligned with UK Home Office guidance—we engage constructively with suppliers, providing challenge as well as support to drive meaningful enhancements.

We set clear expectations that all suppliers operate in line with international labour standards and uphold fundamental human rights. Suppliers are encouraged to adopt a proportionate, risk-based approach to identifying and managing modern slavery risks across their own businesses and supply chains. Through ongoing engagement, monitoring, and open dialogue, we aim to foster a culture of accountability and shared responsibility, ensuring that ethical practices are embedded throughout our supply network.

NHS SBS Policies in relation to Modern Slavery and Human Trafficking

NHS SBS maintains a comprehensive and integrated policy framework that underpins our commitment to preventing modern slavery and human trafficking across our operations and direct supply chain.

These policies demonstrate a proactive, organisation-wide approach, embedding ethical standards, accountability, and continuous improvement into our day-to-day activities.

Code of Ethics

Our Code of Ethics forms the foundation of our commitment to integrity, transparency, fairness, and respect in all our relationships, including with customers, employees, suppliers, and wider society. It is aligned with the 10 principles of the UN Global Compact, explicitly addressing the prevention of child labour, forced labour, and exploitation. We actively encourage a culture of openness and accountability, supported by a confidential whistleblowing process that enables employees to report concerns, including those relating to human rights or modern slavery. Where any potential instances are identified, we are committed to working sensitively and constructively to support affected individuals and ensure appropriate remediation.

Equal Opportunities and Diversity Policy

Our commitment to establishing and maintaining a working environment which is free from discrimination, and which values all employees as individuals.

Recruitment and Selection Policy

We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers. All candidates must go through a verified right to work check and in the UK, we have a requirement to comply with the Modern Slavery Act 2015 contained in our supplier contracts.

Responsible Procurement Policy

This policy applies to all procurement activities and requires we adhere to social, ethical, human, and labour standards in the procurement of goods and services. Our standard supplier terms & conditions also require suppliers to uphold human & labour rights and local legislation to prevent modern slavery & human trafficking in their own operations and supply chains. This policy has been updated in 2025, to reflect the importance of the code of ethics and our supplier code of conduct.

Sustainability Policy Applicable to all employees, this policy explicitly commits us to preventing slavery within our internal operations as well as requiring us to uphold human and labour rights.

Green Plan

A unique NHS SBS Green Plan outlining our commitment to environmental sustainability, ensuring environmental climate challenges have a direct link to social challenges and we have set out how we will address this.

Social Value Policy

The NHS SBS social value policy is there to guide ethical behaviour and additional social impact across our organisation relating to both internal activity and procurement activity and includes the commitment to mitigate against the risk of modern slavery.

CIPS Ethical Mark

The CIPS Ethical Mark, also known as the CIPS Corporate Ethics Mark, signifies that NHS SBS as an organisation is committed to ethical procurement and supply chain practices. We have signed a statement of commitment to ethical sourcing, trained staff in ethical supplier management, and actively safeguarding against unethical conduct in our procurement processes.

Due Diligence

Any suspected cases of slavery or human trafficking can be raised by an employee, using the procedures outlined in the Reporting of Suspected Modern Slavery SOP.

All NHS SBS employees undertake mandatory Modern Slavery training and are provided the UK Government Modern Slavery Helpline

We subscribe to the Unseen Business membership giving us access to expert consultancy, training and peer to peer networks around modern slavery.

To date we have not had any instances of an employee reporting a suspected case of modern slavery within our company.



Due Diligence: Within our Recruitment process

- **Pre employment checks** – We undertake robust pre-employment checks including verification of identity and confirmation of an employee’s ongoing right to work in the UK.
- **Retention of identity documents** – We do not retain or withhold personal identity documents, such as passports, at any point during an employee’s employment with us.
- **Contracts of employment** – All employees are issued with a contract of employment. Clearly setting out the employee’s rights and obligations including the notice period required to terminate the contract.
- **Freedom of employment** – Employees are free to give notice and leave Sopra Steria Limited at any time in accordance with their contractual terms.

Due Diligence: Within our Operations

- **Working conditions and statutory rights** – We comply with, and, in many cases exceed, all relevant legislation relating to working time and statutory leave. This includes holiday entitlement, rest breaks & rest periods, sickness absence, maternity & paternity leave and time off for personal emergencies. These policies are communicated to all employees as part of the induction process.
- **Policy communication** – Updates to existing policies, or the introduction of new policies, are communicated to all employees through group wide communications to ensure awareness of their employment rights.
- **Freedom of association** – We respect the right of all employees to join a trade union. Where employees choose to be represented by a recognised trade union, NHS SBS is committed to engaging constructively with them to maintain positive and harmonious industrial relations.
- **Whistleblowing arrangements** – All employees have access to a confidential whistleblowing process updated in late 2025. It enables them to raise concerns including any suspected breaches of human rights or instances of human trafficking. We continue our ongoing efforts to identify potential risks though to date, no cases of modern slavery or human trafficking have been reported within the business.
- **Real Living Wage commitment** – NHS SBS has been an accredited real Living Wage employer for the past five years. We voluntarily pay all our employees, as a minimum, the real Living Wage including those employed through our property and facilities service providers. In addition, our Supplier Code of Conduct sets an expectation for suppliers to either pay the real Living Wage or to be working towards achieving real Living Wage accreditation.

Due Diligence: Within the NHS SBS Supply Chain – Direct Procurement

NHS SBS direct procurement supply chain presents the greatest risk for Modern Slavery and Human Trafficking, and therefore the relationship and engagement with our supply chain is a critical part of our commitment to eliminating Modern Slavery.

In 2025 NHS SBS procured £28.6M of goods and services, of which, 99% is with organisations based in the UK and 1% within the European Union. Key categories of expenditure comprise:

- IT Services.
- Professional Services.
- General Services- which include Facilities Services.
- Human Resources.

Based off our supplier spend data, IT equipment and services make up the majority of our spend, followed by professional services and human resources. Through desk research, IT Equipment, will have a high-risk level of modern slavery at the second and third tier of our supply chain based off the industry type, country of origin of materials or equipment, and therefore would require higher levels or risk assessments for modern slavery.

We have done an actual risk assessment of our direct supply chain in 2023, we will assess the need to update this in 2026 based on whether there are any substantial changes to our supply chain.

Supplier Engagement

NHS SBS operates a modern slavery supplier engagement programme. It is designed to identify, assess and mitigate modern slavery and human trafficking risks across our supply chain. Key elements of this programme include:

- **Supplier onboarding and contractual controls** – All new suppliers are assessed as part of the onboarding process. They are required to accept NHS SBS's Supplier Code of Conduct and standard terms and conditions.
- **Supplier Code of Conduct obligations** – Ensuring neither they nor their suppliers engage in child labour and that their employment of young workers complies with ILO standards and applicable local legislation. The Supplier Code of Conduct is reviewed annually and on an ad hoc basis when required, to ensure it remains relevant and contains clear and effective obligations for our supply chain partners.
- **Supplier assessment and monitoring** – We use EcoVadis to assess and monitor key suppliers against 21 environmental, social and ethical criteria. This includes gathering data on labour standards and fair business practices within suppliers' own operations and across their supply chains. The assessment process enables us to identify potential areas of risk and agree corrective action plans, supporting collaboration, transparency and continuous improvement.
- **Issue escalation and remediation** – Any suspected incidents of modern slavery within our supply chain will be investigated. Suppliers will be required to implement appropriate remedial actions within an agreed timeframe. Where NHS SBS are not satisfied with the outcome, we reserve the right to terminate business relationships or contracts with suppliers who fail to address our concerns.
- **Fair and responsible payment practices** – NHS SBS is a signatory to the Prompt Payment Code. It promotes best practice in payment standards and helps to reduce the risk associated with late or extended supplier payments. We are in the process of becoming a signatory to the new Fair Payment Code which introduces additional controls to support fair and transparent financial practices within supply chains. Our standard payment terms are net 30 days which help to reduce financial pressure on suppliers that could increase the risk of modern slavery.

Training and raising awareness

At NHS SBS, we recognise the importance of ensuring our employees:

- Understand the risks associated with modern slavery.
- Can recognise potential indicators.
- Know how to report concerns within our operations and supply chain.

To support this, we have implemented the following training and awareness raising activities:

- **Mandatory modern slavery training** All employees, including contractors, are required to complete a mandatory online training module on modern slavery and human trafficking. It raises awareness of individual rights and provides guidance on how to identify and report on potential signs of modern slavery within our business and supply chain. During 2025, we launched a refreshed e-learning module. This was developed in collaboration with Unseen, a specialist modern slavery charity, to strengthen the quality, relevance and effectiveness of our training. It also enhanced our overall approach to identifying and mitigating modern slavery risks.
- **Role specific training** We provide additional enhanced training for employees with roles in Procurement and Facilities Management who engage directly with suppliers delivering services identified as having a higher inherent risk of modern slavery.



Activities undertaken this financial year

NHS SBS has continued to strengthen its approach to identifying, managing, and mitigating modern slavery risks, demonstrating measurable progress and a commitment to continuous improvement across both organisational activity and procurement delivery.

NHS SBS has continued to publish its Modern Slavery Statement on the UK Government's Modern Slavery Statement Registry, reinforcing our commitment to transparency and accountability in line with the Modern Slavery Act 2015. Our 2024 statement fully met all recommended UK Government reporting criteria and demonstrated clear year-on-year progress, reflecting the growing maturity and effectiveness of our approach.

We have completed the UK Government's Modern Slavery Assessment Tool (MSAT), achieving an overall score of 97%. This provides strong assurance regarding the robustness of our policies, controls, and risk management processes. The assessment also serves as a valuable benchmark, helping to inform targeted improvements and guide our ongoing programme of development.

NHS SBS has renewed its membership of the Unseen Business Hub, strengthening our access to expert guidance and sector-leading insight. Through this partnership, we have benefited from specialist consultancy support in developing and reviewing our Modern Slavery Statement, delivered targeted training for procurement and finance teams, and engaged in peer-to-peer networking to share best practice and drive collective progress.

Key Performance Indicators and 2026 priorities

We have introduced the following key performance indicators (KPIs) in response to the introduction of the Modern Slavery Act 2015.

The indicators and activities are reviewed at least annually through our Procurement team, Sustainability and Social Value team and the Executive committee who sign this statement off.

The Modern Slavery KPIs are managed by our Social Value Delivery Manager in collaboration with our Procurement team and People and Culture team.

KPI Category	KPI
Supplier engagement	100% of our suppliers to have agreed to the supplier Code of Conduct.
Modern Slavery Training	Ensure that 100% of all existing and new employees complete the compulsory Modern Slavery training.
Framework Risk Assessments	Ensure 100% of frameworks are risk assessed precontract, to determine High, Medium or Low risks, and ensure terms and conditions, as well as appropriate measures based on risk level are included in the Framework.

Alongside our Key Performance Indicators, to strengthen our strategy to mitigate and prevent Modern Slavery in our organisation and supply chains, we set out the below key priorities for 2026. Our progress against these is below:

Priority 1: Enhancing training of Modern Slavery across all team members at NHS SBS whose role has a material link to either NHS SBS supply chain, or our client's supply chain.

In 2025, we delivered procurement wide training that was tailored specifically to implementing upskilling our finance and accounting team, and procurement teams in response to the updated social value model and procurement legislation. In 2026 we will pursue a risk mapping of the ISFE2 finance solution to inform targeted training of relevant departments.

Priority 2: Continue to lead as a framework supplier by ensuring compliance with PPN 009 and engaging with suppliers to awarded to our frameworks to support continuous improvement.

In 2025 we actively reached out to suppliers on our frameworks through our supplier engagement meetings to ensure their compliance with our MSAT KPIs. In 2026 we will work with suppliers to review their continuous improvement.

Responsibility

The responsibility for our initiatives addressing Modern Slavery and Human Trafficking is as follows:

Policies

Sustainability & Social Value – Director of Procurement, Sustainability and Social Value (NHS SBS), delivered by Social Value Delivery Manager (NHS SBS).

Human Resources – Director of Human Resources (NHS SBS), for policies related to the prevention of slavery and human trafficking in our own operations.

Sopra Steria Group Code of Ethics – Chairman Sopra Steria Group SA (France).

Direct Procurement – Procurement Director, Sopra Steria Limited. For policies related to the prevention of modern slavery and human trafficking in our supply chain.

Procurement as a service – Director of Procurement, Sustainability and Social value. For policies relating to NHS SBS Procurement solutions and related modern slavery risk assessments.

Due Diligence

NHS SBS Human Resources team are responsible for ensuring that all due diligence checks are undertaken during all the stages of employment, from initial recruitment onward.

In our Procurement and direct supply chain management activities, Sopra Steria Limited Procurement team are responsible for undertaking due diligence activities including policy checks and supply engagement as our service provider.

For other such activities related to Modern Slavery and Human Trafficking, they take input from other parts of the business, including Legal, HR and Sustainability and Social Value and where specific NHS SBS actions are taken these are owned and managed by NHS SBS Social Value team.

Board approval

NHS Shared Business Service's Board of Directors has approved this statement for the Financial Year ending 31st December 2025.



Managing Director: Erika Bannerman
Date: 24 June 2026

NHS Shared Business Services Limited

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About us

NHS Shared Business Services was created in 2004 by the Department of Health and Social Care to deliver the most cost effective and highest quality corporate services to the NHS. A unique joint venture with Sopra Steria, a European leader in digital services and software development, we make life easier for NHS employees, patients and suppliers, and deliver value for money to the taxpayer.

Proud members of the NHS family, we provide finance & accounting, procurement, workforce, digital and expert advisory services to more than half the NHS in England. Committed to being a force for good, we are dedicated to acting responsibly and sustainably at organisational, team and individual level. Sharing common values and unity of purpose with the rest of the NHS family, our solutions are underpinned by cutting-edge technologies and our teams' expertise, in-depth understanding of the NHS, and commitment to service excellence.

For more information, please visit www.sbs.nhs.uk