



MODERN SLAVERY STATEMENT 2024

1. Introduction
2. Organisational structure and supply chains
3. NHS SBS policies in relation to Modern slavery and Human Trafficking
4. Due Diligence: processes and practice
5. Training and awareness-building
6. Key Performance Indicators
7. 2024 Enhancements
8. Responsibility
9. Board Approval

1. 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 enables 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 2024 and is in full accordance with the following legislation and guidance.

- Section 54 of Her Majesty's Government Modern Slavery Act (2015)
- PPN 05/19 Tackling Modern Slavery in Government Supply Chains
- PPN 02/23 Tackling Modern Slavery in Government Supply Chains
- Transparency in supply chains: a practical guide, Home Office (updated April 2020)

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

2. 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 Ltd.

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.

NHS SBS direct supply chain comprises of 99% organisations and businesses with head offices located within the UK and we have identified that suppliers beyond our tier 1 supply chain (upstream) may be based in countries with a higher risk of Modern Slavery.

Sopra Steria Limited, manage, govern, and assure direct procurement on behalf of NHS SBS.

Regardless of geographical location, all NHS SBS suppliers are expected to prevent Modern Slavery and Human Trafficking within their own organisations, and any onward supply chains.

NHS SBS Policies in relation to Modern Slavery and Human Trafficking

2.1. Relevant Policies

The following policies define the interventions NHS SBS has taken to prevent Modern Slavery and Human Trafficking in our operations and direct supply chain:

- **Code of Ethics** – underpins our approach to transparency fairness and loyalty towards our customers, employees, suppliers, and others in wider society. The Code of Ethics is aligned to the 10 principles of the UN Global Compact, including fighting against child labour and exploitation, forced labour or any form of compulsory labour. All employees are provided with access to a whistleblowing process enabling them to report concerns that are contrary to this code including breaches of human rights and human trafficking. Should a case of Modern

Slavery be suspected, NHS SBS will work with the victims to provide support and 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.

In 2025, we have been awarded the CIPS Ethical Mark, signifying our commitment to ethical procurement and supply chain practices.

- **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:** New this year, 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.

3. Due Diligence: Processes and Practices

3.1. Within NHS SBS Operations

We are committed to preventing slavery and human trafficking in NHS SBS operations and have several processes in place to ensure that our employees are not being exploited, and that they have a safe and supportive working environment. To deliver this we have taken the following steps:

- All NHS SBS employees have a contract that sets out their Employment Rights and Obligations including the notice period needed for them to terminate the contract and leave our employment. Employees are free to serve notice at any time.
- We verify employee's identity and ongoing right to work in the UK.
- We do not withhold any employee's physical identity documents (e.g., passport) during their employment.
- We comply with or provide enhanced versions of all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies, sickness and maternity/ paternity leave and minimum rest breaks and periods.
- We respect the right of individual employees to join a trade union and, where groups of employees elect to be represented by a trade union, we are committed to engaging with trade unions in pursuit of harmonious industrial relations.
- We have introduced a communication and training campaign around Modern Slavery, to make employees aware of their rights and how to spot and report signs of Modern Slavery.
- We collaborated with industry bodies to identify Modern Slavery best practice, verify implementation, and share learning via a Community of Practice with TechUK.
- NHS SBS are an accredited Living Wage Employer, committed to paying a wage based on the cost of living to all employees.

Any suspected cases of slavery or human trafficking can be raised by an employee, using the procedures outlined in the Code of Ethics.

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

Our executive committee received a specialist in-person update on our direct supply chain risk delivered by STOP THE TRAFFIK

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

3.2. 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.

During all stages of the procurement life cycle, Modern Slavery risks are considered, as outlined in the processes below. If there is a suspected case of Modern Slavery, the correct procedures are taken, and we work with suppliers through our policies and contracts to deal with any issues on a case-by-case basis.

Through our supplier engagement program, should we be notified that a supplier has an identified risk of modern slavery, or the risk market shifts, to where a supplier may be at risk for modern slavery, we require suppliers to put together an action plan to address gaps in their process, root causes of the incident and a corrective action plan that they have put in place

In 2024 NHS SBS procured £22.167M 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

Although we have not encountered any cases of Modern Slavery in our direct supply chain, based off our supplier spend data, IT equipment and services make up the majority of our spend, followed by professional services and human resources. IT Equipment has a high-risk level of modern slavery based off the industry type, country of origin of materials or equipment, and therefore would require higher levels of risk assessments for modern slavery. We are looking to address this in 2025. We have done an inherent risk assessment of our direct supply chain in 2023 and will continue to look to do this again in 2025.

Robust due diligence is undertaken when assessing new suppliers and the NHS SBS supply chain is reviewed on an annual basis, alongside updating the Modern Slavery Statement. This approach has developed a strong Modern Slavery supply chain engagement programme for all suppliers which includes:

- An assessment of every new supplier during the onboarding process, which includes acceptance of our Supplier Code of Conduct and our standard Terms and Conditions. Our Supplier Code of Conduct mandates our Suppliers comply with a set of obligations which include,
 - Prevention of modern slavery and human trafficking in their own operations and supply chains.
 - Ensuring neither they nor their suppliers use child labour and that their employment of young workers adheres to ILO's standards and local regulations.
 - Confirming neither they nor their suppliers use debt bonded labour in their operations.
- Using EcoVadis to assess and monitor our key suppliers against 21 different areas related to social, environmental, and ethical responsibility in the supply chain. Data is gathered on our suppliers' labour standards and fair business practices from both their own organisations and any downstream supply chain. This assessment allows identification of areas of concern and implements supplier action plans for improvements.
- Invoking sanctions regarding a suspected case of modern slavery in our supply chain. We collaborate with our suppliers to investigate and ensure appropriate procedures are followed within a given timeframe. If we are not satisfied with the result, we will investigate the termination of business relationships or contracts with suppliers who fail to improve their performance in line with an action plan or where our agreed terms of trading have been breached.

- Vigorous risk review of modern slavery during all stages of the procurement process including tender evaluation, contract award and in-life contract management.
- NHS SBS continue to be a signatory of the Prompt Payment Code. This sets standards for payment best practice and reduces the risk of late and extended payments. This in turn reduces pressures on suppliers that could lead to modern slavery. Our average time taken to pay invoices is 24 days, with 94% of invoices being paid under 30 days and 6% of invoices being paid within 31-60 days.
- Continually monitoring our Supplier Code of Conduct to ensure it is relevant and contains clear obligations for our supplier's concerning prevention of modern slavery and reporting compliance with the code monthly to our parent company, Sopra Steria Group
- We set an expectation in our Supplier Code of Conduct that our suppliers pay the Living Wage and work towards Living Wage accreditation.
- In 2022, NHS SBS undertook an enhanced, specialist risk assessment of our tier 1 supply chain (approx. 180 suppliers) to understand the inherent risks of Modern Slavery and Human Trafficking In our direct supply chain. To continue our progress, in 2023, we undertook an actual risk assessment of those identified as high risk to understand the material risk. In doing this, we have been able to make tangible changes to our supply chain (See case study 1).
- Using electronic invoicing technology for suppliers to enable the achievement of our goal to pay all suppliers in accordance with our terms.

Furthermore, in this reporting year we have undertaken the following additional enhancements:

- Continued to add our Statement to the Modern Slavery Statement Registry to ensure complete transparency of our operations.
- Completed the Modern Slavery Assessment to further understand areas of development in our programme.
- As a result of establishing the Social Value Steering Board in late 2022, we now employ a dedicated Responsible Supply Chain resource to focus on all aspects of Responsible Procurement including modern slavery.
- We have mapped the actual risk of our suppliers against the work of STOP THE TRAFFIK based on the methodology shown below.
- Engaged our supply chain in an engagement programme which includes asking them questions on Modern Slavery, this covered 70% of our suppliers based on our Green House Gas Emissions.

- We have now joined a partnership with Unseen, an organisation dedicated to removing modern slavery. This partnership has undertaken an initial review of our current Modern Slavery Statement and will review and develop an onboarding process for new suppliers and colleagues, a two hour online live bespoke training session focused on procurement, and deliver a mandatory eLearning training program, rolled out to all colleagues across NHS SBS.

Case Study 1: Facilities Management Tender

The procurement working group recognised through our independent Stop the Traffik risk assessment, that facilities management is one of the few areas in our direct supply chain where there is a greater inherent risk for modern slavery. As such, the group knew it was essential for this tender that any supplier was aligned with our commitment to mitigate the risk of modern slavery. Therefore, when undertaking a re-tender of this service in 2024 for all of the NHS SBS estate, the group undertook a more robust process including enhanced supplier evaluation to ensure essential alignment in our vision to mitigate modern slavery. Through this the working group have engaged closely with prospective bidders to understand their approach to Social Value and to the prevention of modern slavery, ensuring the successful bidder was fully committed to working in accordance with NHS SBS standards on this important topic

3.3. Within the NHS SBS Procurement line of business

At NHS SBS, one of our core services to the NHS is the creation of compliant Framework Agreements as well as a range of procurement solutions including transactional and strategic procurement.

For all our procurement services delivered to customers, we ensure full compliance with PPN 02/23 and undertake a clear, documented risk assessment of each new procurement solution (where proportionate to do so). If high or medium risk is identified, a range of modern slavery questions are asked as part of the award criteria in accordance with the Social Value Act. In 2025, we will be following the guidance on implementing PPN 009.

In 2023, we are proud to have launched a new risk module on our procurement system, enabling us to identify locations of suppliers and their potential inherent risk in relation to modern slavery. This tool enables us to undertake a robust risk assessment process and

continually identify risks throughout the procurement process, not just during tender stage.

In 2024, we worked to understand how we can further monitor the progress made by suppliers to mitigate modern slavery. We focused on how we can engage the wider supplier network on which we have influence, on issues relating to modern slavery across the healthcare supply chain. In 2025, we will continue to focus on our supplier engagement, through our pre-market engagement process to highlight the importance of mitigating modern slavery.

3.4. Contractual obligations on NHS SBS as a supplier

NHS SBS is a shared service provider to the NHS across the UK, delivering critical infrastructure and key strategic services including procurement, employment services, finance and accounting and consulting. To deliver these services, we compete for and enter into contracts with our customers to ensure that our services offer relevance, value and are compliant with NHS needs.

In these contracts, we take responsibility to mitigate the risk of Modern Slavery. We have a clear structure of responsibility in relation to obligations for Modern Slavery reporting and due diligence in contracts. The NHS SBS service delivery areas deliver these actions as needed as part of BAU activity, in accordance with NHS SBS policies and processes outlined in this document.

4. Training and Awareness-Building on Modern Slavery and Human Trafficking

We know how vital it is that our employees understand the issue of Modern Slavery and can recognise the signs and report potential instances in our supply chain. Therefore, we have undertaken the following activities within education and awareness building.

- Training sessions for employees who are engaging with suppliers, such as the Procurement and Facilities Teams, to help them understand the risks of Modern Slavery and Human Trafficking, specific to their supply chains, and how to spot potential dangers through both the initial supplier on boarding process and subsequent suppliers reviews and assessments. This training is provided on an annual basis.

- We continue to provide mandatory Modern Slavery training for all employees, including contractors, and all new starters to the company are asked to complete this as part of their induction process. This training includes ILO's Forced Labour Indicators. Individuals have to complete the mandatory training every two years.
- Each year we undertake a training session or update for the NHS SBS executive team, this has been delivered by Stop The Traffik in the past and will be run by Unseen going forward. Unseen is a modern slavery prevention not-for-profit, on the risks and mitigations of Modern Slavery in the healthcare Industry and our direct supply chain.
- During 2025, we will be launching our new mandatory Modern Slavery training to enhance the ability of our colleagues to spot signs and report them.

5. Key Performance Indicators and 2024/2025 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 Senior Social Value Manager who is responsible for progressing KPIs throughout the year.

KPI Category	KPI 2023/2024	Achieved?	KPI for 2024/2025
Supplier Engagement	100% of our suppliers to have agreed to the supplier Code of Conduct (which includes mitigation against modern slavery).	Yes	Enhanced Supplier Engagement Program-improved KPI tracking
Modern Slavery Training	Ensure that 100% of all existing and new employees complete the compulsory	Yes	Ensure 100% of all existing and new employees complete the new Modern Slavery Training program released for 2025 by

	Modern Slavery training.		Unseen. Ensure live Modern Slavery training takes place online for procurement colleagues.
Engagement with Non-Governmental Organisations and Not-For-Profit's	Partnership with charity Unseen	Yes	Partnership with Unseen to review Modern Slavery Statement, look at ways to improve risk assessments for pre-procurement for frameworks, and deliver MS training
Ensure alignment with partners to enhance our organisational understanding of Modern Slavery and improve our policy and process.	Ensure alignment to PPN 02/23, and on track with monitoring and mitigating modern slavery risk within procurement in alignment with NHSE requirements	Yes	Ensure alignment to PPN 009 and improve our policy and process within NHS SBS.
Framework Risk Assessments	Ensure 100% of frameworks are risk assessed pre contract, 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.	Yes	Ensure 100% of frameworks are risk assessed pre contract, 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 3 key priorities for 2024. Our progress against these is below:

Key Priority Area 2023/2024	Progress	Key Priority Area 2024/2025
<p>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.</p>	<p>In 2024, we worked to understand where there is a material opportunity to upskill and have implemented further training for our procurement teams. Alongside this, we rolled out procurement wide training that was tailored specifically to implementing PPN 06/23 with our partner organisation Unseen. This training highlighted the importance of risk assessments pre-contract, and how to build risk assessment of modern slavery risk into Frameworks successfully. In 2024, we prioritised upskilling our finance and accounting team. In 2025, we have planned training on modern slavery to all colleagues within procurement.</p>	<p>Undertake a Gap Analysis of the ISFE2 solution to identify opportunities to mitigate modern slavery in the NHS Supply chain. In 2025, we have planned training on modern slavery to all colleagues within procurement.</p>
<p>Undertaking key mitigation activity against suppliers identified in high-risk categories through our partner Unseen.</p>	<p>We are incredibly proud of the progress we have taken to review all identified high-risk suppliers and deliver mitigating actions against these suppliers. The most critical of these was our Facilities Management Supplier who following enhanced evaluation in a new tender, we have now moved away from.</p>	<p>In 2025, we plan to undergo an inherent risk mapping of our direct supply chain and enhance our pre procurement risk assessments when forming our framework agreements.</p>

<p>Engage with our direct supply chain on our work with Modern Slavery and continue to spread awareness of identification and prevention.</p>	<p>In 2024, we had a supplier engagement program through Sopra Steria to improve reporting. We continued to work with our supply chain through our pre-market engagement process and provided webinar training on modern slavery risks.</p>	<p>We will improve our engagement with our suppliers through webinars, emails, and information sessions. We will review and develop our supplier onboarding process with our partner Unseen to improve areas where modern slavery could be a potential risk.</p>
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6. Responsibility

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

Policies

- Sustainability & Social Value – Director of Procurement, Sustainability and Social Impact (NHS SBS), delivered by the Senior Social Value and Community Impact 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 Impact. 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.

7. Board Approval

NHS Shared Business Service's Board of Directors has approved this statement for the Financial Year ending 31st December 2024

A handwritten signature in black ink, appearing to read 'E. Bannerman', with a long horizontal flourish extending to the right.

Managing Director: Erika Bannerman
[11 April 2025]

Version Number	Creation Date	Updated by/ Author Job Title	Approver Job Title	Comments
1	20/05/2024	Head of Sustainability and Social Value	Managing Director	
2	24/03/2025	Senior Social Value and Community Impact manager		

Next Review Date: 20/05/2026