

Modern Slavery Statement

NHS Shared Business Services Limited

1. Introduction

This statement sets out the actions NHS Shared Business Services Limited ("NHS SBS") actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to the financial year ending 31st December 2016.

As part of the Business Process services sector, NHS SBS recognises that it has a responsibility to take a robust approach to prevent slavery and human trafficking.

NHS SBS is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

2. Organisational structure and supply chains

This statement covers the activities of NHS Shared Business Services Limited. NHS SBS is based in Bristol, Leeds, Salford, Sheffield and Southampton, United Kingdom.

NHS SBS is a joint venture between the Department of Health and Sopra Steria Ltd founded in 2004. Sopra Steria Ltd is a part of Sopra Steria Group, based in Paris, France.

NHS SBS is the UK's leading provider of business support services to the NHS in England working with over a third of NHS Trusts, 100% of the NHS Commissioning organisations and NHS Provider organisations.

Our mission is to deliver £1 billion savings back to the NHS by 2020 and we have already delivered audited savings of almost £400m to our NHS clients.

Our Supply Chains are primarily comprised of organisations within the UK or Europe and we do not normally operate outside of these countries. NHS SBS avoids contracting with suppliers or sub-contractors which are located within geographical areas where slavery and human trafficking are a higher risk. However, we recognise that our upstream supply chain does include countries with a higher risk of modern slavery or human trafficking and we expect our suppliers to pass on this obligation to their supply chain in higher risk countries. We also recognise that slavery and human trafficking does occur in the UK and Europe.

NHS SBS also has two major suppliers that are companies within the Sopra Steria Group: Sopra Steria Recruitment, which provides recruitment services to NHS SBS and other companies; and Steria India, which provides IT and business process services to NHS SBS and other companies. Sopra Steria Recruitment is based in the UK. Steria India is based in India.

3. NHS SBS's approach to preventing slavery and human trafficking

3.1. Relevant policies

NHS SBS has implemented the following policies that describe the steps the Company takes which prevent slavery and human trafficking in its operations and supply chain:

- **Code of Ethics** – applicable to all NHS SBS and Sopra Steria employees including in India, the Code of Ethics describes our commitment to the 10 principles of the UN Global Compact, including fighting against child labour and exploitation, forced labour or any form of compulsory labour.
- **Sustainability Policy** – applicable to all NHS SBS' employees, this policy commits the Company to preventing slavery explicitly. It also requires us to uphold human and labour rights.
- **Business Integrity Policy** – it is important to NHS SBS that any fraud, misconduct or wrongdoing by workers or officers of the Company which would threaten the integrity of the business, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking, is reported and properly dealt with. The Company encourages all individuals to raise any concerns that they may have about the conduct of others in their business dealings on behalf of the Company or about the way in which the business is run using the procedures outlined in this policy.
- **Sustainable Procurement Policy** – this policy applies to all procurement activity in the UK and requires NHS SBS to adhere to social and ethical standards, and human and labour standards in the procurement of goods and services. Our standard terms and conditions for suppliers also require suppliers to uphold human and labour rights and (in the UK) to prevent modern slavery and human trafficking in their own operations and supply chains.
- **Policy for Recruitment/Agency workers** – NHS SBS uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. In the UK, a requirement to comply with the Modern Slavery Act 2015 will be contained in our updated supplier contracts and existing suppliers will be required to comply on renewal.

3.2. Processes and practices

3.2.1. Within our own operations

The prevention of modern slavery and promotion of human rights is largely achieved by adherence with relevant employment legislation. NHS SBS has a responsibility to ensure that workers are not being exploited, that they are safe at work and that relevant employment, health and safety and human rights laws are adhered to. A suspected case of slavery or human trafficking within the Company's own operations should be raised using the procedures outlined in the Business Integrity Policy.

Due Diligence: The following steps are undertaken to ensure there is no slavery or human trafficking within our own operations:

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- All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave the Company's employment. Employees are free to serve notice at any time.
 - The Company carries out verification of an employee's identity and ongoing right to work in the UK and does not seek to withhold any of an employee's identity documents or passport etc.
 - All employees are paid at least the national minimum wage and the Company adheres to all legislation in respect of working time and statutory time off, providing for minimum amounts of holiday, time off due to personal emergencies, sickness and maternity/paternity and minimum rest breaks and periods.

3.2.2. Within our supply chain

Our Sustainability Risk Matrix for supply chain management determines levels of risk in supply categories. If a category of supply has been assessed to have a higher level of risk, suppliers within that category with which NHS SBS maintains a certain level of spend will be invited to participate in our supplier engagement process for sustainability, which includes a more thorough assessment of suppliers' sustainability management processes, including the prevention of slavery and human trafficking.

NHS SBS undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- Using the Company's Sustainability Risk Matrix, which covers more than a dozen key sustainability risk areas including procurement, and which was introduced in late 2016. Suppliers that have an overall higher sustainability risk score will be asked about the steps they are taking to prevent human and labour rights abuses.
- Evaluating the modern slavery and human trafficking risks of each new supplier by using a new supplier questionnaire and our Sustainability Risk Matrix assessment process.
- Requiring all suppliers to abide by our Supplier Code of Conduct, which prohibits human trafficking and slavery, and requires suppliers to take proactive steps to ensure it does not occur in their operations of supply chains
- Taking steps to improve substandard suppliers' practices, including providing advice and guidance to suppliers requiring them to implement action plans;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our terms and conditions, including the termination of the business relationships or contracts.

3.3. Training and awareness-building

NHS SBS will undertake an awareness-building communications campaign to enable all employees to understand that slavery and human trafficking is a persistent problem, the risks and signs of slavery and human trafficking, and the requirements of the Modern Slavery Act. The campaign will first seek

to raise awareness amongst people managers and remind them of their responsibility to ensure their team members are aware. Special, more detailed briefings have been and will also be carried out in particular functional areas of our business where employees may have additional opportunity or responsibility to identify slavery and trafficking risks, such as HR, Legal and Procurement.

4. Performance indicators

NHS SBS has established the following key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. These indicators effectively establish the activities the Company plans to carry out according to the timescales below. The indicators and activities will be reviewed at least annually.

- Incorporate requirements for suppliers to work to prevent slavery and human trafficking into our standard terms and conditions for suppliers
- Implement a procurement risk matrix and assessment process that includes slavery and human trafficking, in order to assess the risk areas of our supply base on an ongoing basis
- Integrate the topic of slavery and trafficking into our supplier engagement processes for sustainability
- Execute an awareness-building communications campaign on slavery and human trafficking, and the requirements of the Modern Slavery Act

5. Responsibility

Responsibility for NHS SBS's anti-slavery initiatives is as follows.

5.1. Policies:

Responsibility for policies related to anti-slavery is allocated across the following areas:

- Human Resources – NHS SBS Director of Human Resources, for policies related to the prevention of slavery and human trafficking in our own operations,
- Sopra Steria Group SA (France) President, for the Sopra Steria Group Code of Ethics
- Procurement – NHS SBS. Chief Procurement Officer, for policies related to the prevention of slavery and human trafficking in our supply chain and for the Sustainability Risk Matrix.

5.2. Risk assessments:

The Head of HR Services in Human Resources is responsible for defining and carrying out risk assessments for employment within our own operations, as appropriate.

Our Sustainable Procurement Lead and other members of our Sustainability team develop risk assessments as part of our Sustainable Supply Chain Management programme.

5.3. Due diligence:

In our own operations: The due diligence carried out to ensure the Company adheres with all employment law is the responsibility of various members of the Human Resources team in the variety of checks undertaken during different stages of employment, from initial recruitment onward.

In our procurement and supply chain management activities: The Company's procurement management team have responsibility for undertaking due diligence activities, and for such activities related to slavery and human trafficking and take input from other parts of our business, including Legal, HR and Sustainability.

5.4. Training and awareness-building

Ensuring NHS SBS' employees are aware of the risks and signs of slavery and human trafficking, and the Company's responsibilities under the Modern Slavery Act is the responsibility of all managers.

6. Board approval

This statement has been approved by NHS SBS's board of directors in relation to the Financial Year ending on 31st December 2016.

Director's signature:

John Torrie

Date: 29th March 2017