

Modern Slavery Statement

NHS Shared Business Services Limited

1. Introduction

This statement sets out the actions NHS Shared Business Services Limited (“NHS SBS”) has taken to understand the potential risks to its business from modern slavery and to ensure 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 2017.

NHS SBS recognises that it has a responsibility to take a robust approach to preventing 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 and is part of the Sopra Steria Group, based in Paris, France.

NHS SBS is a joint venture between the Department of Health and Sopra Steria Ltd founded in 2004. 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.

Sopra Steria is a European leader in digital transformation, providing one of the most comprehensive portfolios of end-to-end service offerings in the market: Consulting, Systems Integration, Software Development and Business Process Services. With 42,000 professionals in over 20 countries Sopra Steria is trusted by leading private and public organisations to deliver successful transformation programmes that address their most complex and critical business challenges. Combining high quality and high performance services, added value and innovation, Sopra Steria enables its clients to make the best use of information technology.

NHS SBS Supply Chains primarily comprise organisations within the UK or Europe and we do not normally operate outside these countries. NHS SBS avoids contracting with suppliers or sub-contractors located in areas where there is a higher risk of slavery and human trafficking than there is in the UK or Europe. 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 prevent and avoid slavery and human trafficking in their supply chains in higher risk countries. We also recognise that slavery and human trafficking does occur in the UK and Europe.

Two companies in the Sopra Steria Group are suppliers to NHS SBS Limited as well as to other companies: Sopra Steria Recruitment, which provides recruitment services; and Sopra Steria India, which provides IT and business process services. Sopra Steria Recruitment is based in the UK. Sopra Steria India is based in India.

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

3.1. Relevant policies

The following policies define the steps NHS SBS has taken to prevent slavery and human trafficking in its operations and supply chain:

- **Code of Ethics** – applicable to all NHS SBS and Sopra Steria employees including those 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 explicitly commits the company to preventing slavery. 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 that would threaten the integrity of the business, including any actions that might raise the risk of slavery or human trafficking, is reported and properly dealt with. The Company encourages all employees 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 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 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

Adherence to relevant employment legislation promotes human rights and largely prevents modern slavery. 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.

Employees and contractors are able to raise a suspected case of slavery or human trafficking within the Company's own operations by following the Company's internal Business Integrity Policy.

Due Diligence: NHS SBS Limited takes the following steps to ensure there is no slavery or human trafficking within its 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.
 - The Company pays all its employees at least the national minimum wage and adheres to all legislation in respect of working time and statutory time off, providing for minimum amounts of holiday, time off for personal emergencies, sickness and maternity/paternity leave and minimum rest breaks and periods.

3.2.2. Within our supply chain

The Company's Sustainability Risk Matrix, introduced in late 2016, covers more than a dozen key sustainability risk areas including procurement, and determines levels of risk by supply category. The Company identifies suppliers in categories of supply with higher levels of risk and with which it maintains a spend above a certain threshold, and invites them to participate in its supplier engagement process for sustainability, which includes a more thorough assessment of their sustainability management processes, including those for the prevention of slavery and human trafficking.

Indian Companies are prohibited by law from employing any bonded or child labour. The Constitution of India guarantees the right to life and liberty and prohibits the practice of debt bondage and other forms of slavery both modern and ancient. Human trafficking in any form is prohibited and any contravention of this provision is an offence punishable in accordance with the law. Sopra Steria India pays all its employees at least the Minimum Wage as prescribed and amended under local legislation from time-to-time. Sopra Steria India complies with all applicable local labour laws.

NHS SBS undertakes due diligence when 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
- Asking suppliers with higher overall sustainability risk scores about the steps they are taking to prevent abuses of human and labour rights
- 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 sign up to our Supplier Code of Conduct, which prohibits slavery and human trafficking, and requiring suppliers to take proactive steps to ensure that slavery and human trafficking do not occur in their operations or supply chains
- Taking steps to improve substandard suppliers' practices, including providing advice and guidance and requiring them to implement action plans
- Invoking sanctions - including the termination of business relationships or contracts - against suppliers that fail to improve their performance in line with an action plan or seriously violate our terms and conditions

3.3. Training and awareness-building

NHS SBS ensures that all new joiners to the company are briefed on the Modern Slavery Act 2015 as part of their induction.

NHS SBS is planning to 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 2015. The campaign will seek to raise awareness among all employees and remind them of their responsibilities.

4. Performance indicators

NHS SBS has established the following key performance indicators (KPIs) in response to 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 are reviewed at least annually.

- Incorporating into our standard purchasing terms and conditions the requirement for suppliers to work to prevent slavery and human trafficking
- Implementing 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
- Integrating the topic of slavery and human trafficking into our supplier engagement processes for sustainability
- Executing 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 initiatives addressing slavery and human trafficking is as follows.

5.1. Policies:

Responsibility for policies is:

- Human Resources – Director of Human Resources, NHS SBS Limited, for policies related to the prevention of slavery and human trafficking in our own operations
- Chairman Sopra Steria Group SA (France), for the Sopra Steria Group Code of Ethics
- Procurement – Chief Procurement Officer, Sopra Steria Limited, 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:

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

5.3. Due diligence:

In our own operations: the Human Resources team are responsible for ensuring that the Company adheres to all employment law in the due diligence 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 are responsible for undertaking due diligence activities, and for such activities related to slavery and human trafficking; they take input from other parts of the business, including Legal, HR and Sustainability.

5.4. Training and awareness-building

All managers are responsible for ensuring that employees of NHS SBS Limited are aware of the risks and signs of slavery and human trafficking, and of the Company's responsibilities under the Modern Slavery Act 2015.

6. Board approval

NHS SBS Limited's Board of Directors has approved this statement for the Financial Year ending on 31st December 2017.

Director's signature:

John Torrie

Director's name: *John Torrie*

Date: 1 / 11 / 2018