

NHS Shared Business Services

Modern Slavery Statement 2021

Shared vision. **Better Together.**



Shared Business Services

Modern Slavery Statement 2021

1.0 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 the entire NHS SBS enterprise embraces the opportunity to address the risks of Modern Slavery and Human Trafficking throughout all of 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 local, national and global supply chains to enhance collective Modern Slavery activity with our partners, customers, stakeholders and suppliers.

This statement outlines the policies, processes and actions that we have taken to understand the potential risks to NHS SBS from Modern Slavery. This statement relates to the financial year ending 31st March 2021 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
- Transparency in supply chains: a practical guide, Home Office (updated April 2020)

NHS Shared Business Services will prevent Modern Slavery and Human Trafficking in our business activities

We will ensure our supply chains are free from Modern Slavery and Human Trafficking

2.0 Organisational Structure

This statement covers the activities of NHS Shared Business Services, United Kingdom. NHS SBS is a unique partnership between the UK Department of Health and Social Care (DHSC) and digital transformation experts Sopra Steria.

Consequently, NHS Shared Business Services is part of Sopra Steria Limited which is part of Sopra Steria Holdings. Sopra Steria Holdings is part of the Sopra Steria Group, based in Paris, France.

NHS SBS provides services to more than 250 NHS organisations across the UK, including 111 NHS providers and arm's length bodies and every NHS commissioning organisation in England.

Our direct supply chain primarily comprises organisations and businesses within the UK and the European Union. However, we have identified that our upstream supply chain also includes countries with a higher risk of Modern Slavery or Human Trafficking.

Regardless of geographical location all NHS SBS suppliers are expected to prevent and avoid Modern Slavery and Human Trafficking in their supply chains.

NHS SBS Procurement activity is directly managed, governed and assured by Sopra Steria Limited.

3.0 NHS SBS Approach to Preventing Modern Slavery and Human Trafficking

3.1 Relevant Policies

The following policies define the interventions we have taken to prevent Modern Slavery and Human Trafficking in our operations and direct supply chain.

- **Code of Ethics** – applicable to all NHS SBS employees including those in India. The Code of Ethics describes our commitment to the 10 principles of the United Nations Global Compact, including fighting child labour and exploitation, forced labour or any form of compulsory labour.

In the last reporting year, we amended our Sustainable Procurement Policy, and improved our Diversity and Inclusion Policy

- **Sustainable Procurement Policy** – Amended in 2020, this policy applies to all procurement activities in the UK and requires we adhere to social and ethical standards, and human and labour standards in the procurement of goods and services. Our standard terms and conditions for our suppliers also requires suppliers to uphold human and labour rights and (in the UK) to prevent Modern Slavery and Human Trafficking in their own operations and their supply chains. This includes a supplier registration questionnaire that specifically includes Modern Slavery.
- **Business Integrity Policy** – any fraud, misconduct, or wrongdoing by NHS SBS employees, that could threaten the integrity of the enterprise, must be reported and addressed appropriately. This includes actions that may increase the risk of Modern Slavery or Human Trafficking. NHS SBS employees are encouraged and supported to raise any concerns that they may have about the conduct of others in their business dealings or the way in which the enterprise itself is operated. We are also continually improving reporting processes and mechanisms to ensure any Modern Slavery concerns can be raised confidentially and acted upon with urgency.
- **Recruitment and Selection Policy** – We only use specified, reputable employment agencies to recruit our workforce and always verify the practices of any new agency before accepting workers from that agency. A requirement to comply with the Modern Slavery Act 2015 is contained in our direct supplier contracts and existing suppliers are required to comply for successful contract renewal.
- **Equal Opportunities and Diversity Policy** – our commitment to establishing and maintaining a working environment which is free from discrimination and values all employees as individuals.

3.2 Due Diligence: Processes and Practices

3.2.1 Within NHS SBS Operations

To ensure that there is no Modern Slavery or Human Trafficking within NHS SBS operations we have taken the following interventions;

- All 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.

Furthermore, in this reporting year we have undertaken additional supportive interventions:

- Collaborated with industry bodies to identify Modern Slavery best practice, verify implementation, share learning via a Community of Practice with TechUK and embedded that industry learning into our policies and operations.
- Achieved Living Wage accreditation, and pay all of our employees, (including all third-party contractors) at least the Living Wage Foundation wage, as minimum.

Any suspected case of Modern Slavery or Human Trafficking would be raised by an employee, using the procedures outlined in the Business Integrity Policy

All NHS SBS employees undertake mandatory Modern Slavery training and are made aware of the UK Government Modern Slavery Helpline

To date we have not had any instances of an employee reporting a suspected case of Modern Slavery within NHS SBS

3.2.2 The NHS SBS Supply Chain – Direct Procurement

The NHS SBS direct procurement supply chain contributes the greatest risk for Modern Slavery and Human Trafficking. Our 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, we consider Modern Slavery risks. If there is a suspected case of Modern Slavery, we will ensure that the correct procedures are taken and the victims are supported. We will work with suppliers through our policies and service-level agreements, and deal with any issues on a case-by-case basis.

NHS SBS annually procures around £22M of goods and services via the Sopra Steria Limited supply chain, of which 94% is with organisations in the UK, 5% with companies within the European Union and North America and 1% from the rest of the world.

Key categories of expenditure comprise:

- Information Technology (IT) and Telecommunications equipment.
- Consultancy and Contractors.

In the reporting year we have:

- Offered electronic invoicing to all suppliers. This will help to improve the payment process and help us achieve our goal to pay all suppliers to terms.

3.3 Training and Awareness-Building

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.

- Role specific training sessions for employees who have roles dealing with suppliers, such as the Procurement and Facilities Teams, to help them understand the risks of Modern Slavery and Human Trafficking and how to spot potential dangers through both the initial supplier on boarding process and subsequent suppliers reviews and assessments.
- In 2020 we introduced a Modern Slavery training module that is compulsory for all employees, contractors and agency supplied staff, and all new starters complete this as part of their induction process. This training includes indicators of Forced Labour (ILO's).

4. Performance Indicators

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.

- 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, and contractors complete the compulsory Modern Slavery training.
 - Ensure that 100% of employees who have roles dealing with suppliers, such as the Procurement Team receive ongoing updates and notifications regarding business & human rights, and specifically Modern Slavery.

5. Enhancements

In 2021/22 NHS SBS will deliver the following enhancements to our Modern Slavery approach and activities;

Priority 1 – Appointment of suitably qualified and experienced Modern Slavery and Ethical Procurement Lead. Commencing Summer 2021

Priority 2 – Modern Slavery Workstream with resourced Improvement Plan linked to NHS SBS Transformation Programme

- Due Diligence and Risk Analysis – full supply chain analysis utilising Modern Slavery risk assessment tools
- Mitigation – Hot spot on-site audits and supplier support/guidance
- Monitoring – transparent supplier data management, reporting and monitoring
- Learning – deepen exemplary community of practice networks including Department of Health and Social Care and TechUK

6. Responsibility

Responsibility for our initiatives addressing Modern Slavery and Human Trafficking are as follows.

6.1. Policies

Responsibility for policies are:

- Human Resources – Director of Human Resources, NHS Shared Business Services, 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 – Head of Procurement, Sopra Steria Limited, for policies related to the prevention of Modern Slavery and Human Trafficking in our supply chain.

6.2. Due Diligence

In our own operation, the 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, our Procurement management team are responsible for undertaking due diligence activities, and for such activities related to Modern Slavery and Human Trafficking, they take input from other parts of the business, including Legal, HR and Sustainability.

7. Board Approval

NHS Shared Business Service's Board of Directors has approved this statement for the Financial Year ending 31 March 2021

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

Managing Director's signature

Managing Director's name: Erika Bannerman

Date: 30 June 2021

