



# Modern Slavery Statement 2022

# MODERN SLAVERY STATEMENT 2022

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## 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 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. This statement relates to the financial year ending 31st December 2022 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 work tirelessly to prevent Modern Slavery and Human Trafficking in our business activities.**

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

## **2. Organisational Structure and supply chains**

This statement covers the activities of NHS Shared Business Services, England. NHS SBS is a unique joint venture between NHS Business Services Authority, a Department of Health and Social Care arms' length body, and digital transformation experts Sopra Steria.

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

NHS SBS provides services to more than 130 NHS organisations across the UK, including 115 NHS providers and arm's length bodies and every NHS commissioning organisation in England.

Our direct supply chain at NHS SBS primarily comprises of organisations and businesses within England (98%). 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.

**Direct Procurement activity for NHS SBS is managed, governed, and assured by Sopra Steria Limited.**

## **3. NHS SBS Policies in relation to 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** – 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. Sopra Steria provides all employees 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.
- **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 from that agency and all candidates must go through a verified right to work check. In the UK, a requirement to comply with the Modern Slavery Act 2015 is contained in our supplier contracts.
- **Sustainable Procurement Policy** – 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 them to uphold human and labour rights and (in the UK) to prevent slavery and human trafficking in their own operations and their supply chains.
- **Sustainability Policy** – applicable to all employees, this policy explicitly commits us to preventing slavery. It also requires us to uphold human and labour rights.

## 4. Due Diligence: Processes and Practices

### 4.1. Within NHS SBS Operations

We are committed to preventing slavery and human trafficking 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 support this, we have taken the following steps:

- 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.
- We collaborated with industry bodies to identify Modern Slavery best practice, verify implementation, share learning via a Community of Practice with TechUK.
- As part of the Sopra Steria group, we are an accredited Living Wage Employer, committed to paying a wage based on the cost of living to all employees.

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

- Continuing to work with Not-For-Profit organisation STOP THE TRAFFIK to support our Modern Slavery workstream and educate employees.
- This year, we have undertaken 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.

- We have also set an expectation in our Supplier Code of Conduct that our suppliers pay the Living Wage and work towards Living Wage accreditation.

**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**

#### **4.2. Within the NHS SBS Supply Chain – Direct Procurement**

The NHS SBS direct procurement supply chain presents 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 £27M of goods and services via the Sopra Steria Limited supply chain, of which 98% is with organisations in the UK, 2% with companies within the European Union and North America.

Key categories of expenditure comprise:

- IT Services
- Consultancy and Contractors.

We undertake robust due diligence when taking on all new suppliers, and regularly review our existing supply chain. Our supply chain engagement programme for all suppliers on modern slavery includes:

- An assessment for every new supplier during the on-boarding process, which includes acceptance of our Supplier Code of Conduct and our standard Terms and Conditions. These prohibit slavery and human trafficking and requires suppliers to take proactive steps to ensure that slavery and human trafficking do not occur in their operations or supply chains.
- Information and policies available to workers in our supply chain on our external website including what to do if there is a suspected case of Modern Slavery.
- Continuing to work with specialist organisation, EcoVadis to assess and monitor our key suppliers against 21 different areas related to Social, environmental, and ethical responsibility in the supply chain. We gather data on our suppliers' labour standards, fair business practices in their own organisations and their supply chain. This assessment allows us to identify areas of concern and provides suppliers with action plans for improvements.
- Work with our suppliers to investigate and ensure the correct procedures are followed within a given time if there is a suspected case of Modern Slavery in our supply chain. If these standards are not met, we will then investigate the termination of business relationships or contracts with suppliers that fail to improve their performance in line with an action plan or where our agreed terms of trading have been breached.
- Reviewing the risks of modern slavery during stages of the procurement process including tender evaluation, contract award and in-life contract management.
- Continuing to be a signatory of the Prompt Payment Code, which sets standards for payment best practice, and reduces the risk of late and extended payments, in turn reducing the pressures on suppliers that could lead to Modern Slavery. Our standard payment terms are Net 30 days, and we currently pay 97% suppliers in accordance with its principles.
- Continually monitoring our Supplier Code of Conduct to ensure that it is relevant and contains clear obligations for our supplier's concerning prevention of Modern Slavery and reporting compliance to the code back to our parent Group monthly.
- Utilise electronic invoicing to suppliers in order to achieve our goal of paying all suppliers in accordance with our terms.

- Uploading our Modern Slavery Statements to the Modern Slavery Registry to ensure transparency.

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

- Added our Statement to the Modern Slavery Statement Registry to ensure complete transparency of our operations.
- We have created the Social Value Steering Board which has exec board sponsorship and comprises representatives from across the business focusing on creating a lasting benefit to our colleagues, clients, our supply chain and communities in which we operate.
- Engaged with specialist Not-For-Profit organisation STOP THE TRAFFIK to raise awareness of Human Trafficking and to provide training. STOP THE TRAFFIK have carried out a risk assessment of the inherent modern slavery risk of our NHS SBS direct suppliers to help us to identify increased risk of slavery and Human Trafficking. Several recommendations have come out of this assessment which will be addressed during the next financial year.

We are continually making improvements to our ongoing monitoring and risk assessments of suppliers and work closely with key suppliers to share best practice and provide opportunities to build open discussions and improve existing safeguards.

**We have worked with STOP THE TRAFFIK to undertake an in-depth inherent risk assessment of our 180 direct suppliers to understand where there are inherent risks of modern slavery.**

## **5. 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.

- We continue to provide mandatory Modern Slavery training which is compulsory for all employees, including contractors, and all new starters to the company will be asked to complete this as part of their induction process. This training includes ILO's Forced Labour Indicators.
- Each year we undertake a training session or update for NHS SBS executive team, run by STOP THE TRAFFIK, a modern slavery prevention not-for-profit, on the risks and mitigations of Modern Slavery In the healthcare Industry and our direct supply chain.
- A training session was also delivered to 140 colleagues in our Procurement line of business by Stuart Barton on the 15th and 16th of November 2022 on Modern Slavery within the UK

## 6. Key Performance Indicators and 2023 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:

- Supplier engagement:
  - 100% of our suppliers to have agreed to the supplier Code of Conduct (which includes mitigation against modern slavery)
- Modern Slavery Training:
  - Ensure that 100% of all existing and new employees complete the compulsory Modern Slavery training
- Engagement with NGO's
  - Ensure alignment with partners to enhance our organisational understanding of Modern Slavery and improve our policy and process.

Alongside our Key Performance Indicators, to strengthen our strategy to mitigating and preventing Modern Slavery in our organisation and supply chains, our 2 key priorities for 2023 are:

### **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.

**Priority 2:**

- Undertaking key mitigation activity against suppliers identified in high-risk categories through STOP THE TRAFFIK inherent risk assessment of our direct supply chain.
- Engage with our direct supply chain on our work with Modern Slavery and continue to spread awareness of identification and prevention.

## **7. Responsibility**

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

### **Policies**

- 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.

### **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, Sopra Steria Limited Procurement team are responsible for undertaking due diligence activities including policy checks and supply engagement. 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

## 8. Board Approval

NHS Shared Business Service's Board of Directors has approved this statement for the Financial Year ending 31st December 2022

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

Managing Director's signature

Managing Director's name: Erika Bannerman

Date: 30 June 2023