

NHS Shared Business Services

Modern Slavery Statement 2019

1. Introduction

This statement sets out the actions that we have taken to understand the potential risks to our business from modern slavery, and to ensure that there is no slavery or human trafficking in our own business and our supply chains. This statement relates to the financial year ending 31st December 2019.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our 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, with a registered office in Hemel Hempstead, United Kingdom. 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

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 over 45,000 professionals, Sopra Steria is trusted by leading private and public organisations to deliver successful transformation programmes that address their most complex and critical business challenges.

Our Supply Chain primarily comprises of organisations within the UK and Europe. 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, including in these higher risk countries.

3. NHS Shared Business Service's Approach to Preventing Slavery and Human Trafficking

NHS SBS is aligned to the following Sopra Steria policies and we will look to put in place NHS SBS specific policies as appropriate.

3.1 Relevant Policies

The following policies define the steps we have taken to prevent slavery and human trafficking in our operations and supply chain:

- Code of Ethics – applicable to all of our employees including those in India. The Code of Ethics describes our commitment to the 17 principles of the UN Global Compact, including fighting against child labour and exploitation, forced labour or any form of compulsory labour.
- Sustainable Procurement Policy – NHS SBS follows the Sopra Steria Sustainable Procurement Policy principles applicable for all procurement activities in the UK. The policy 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 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 supply chains.
- Business Integrity Policy – it is important to us that any fraud, misconduct or wrongdoing by workers or officers of the Company, that would threaten the integrity of the business, is reported and properly dealt with. This includes any actions that might raise the risk of slavery or human trafficking. We encourage all employees to raise any concerns that they may have about the conduct of others in their business dealings. This could be on behalf of the Company or about the way in which the business is conducted, using the procedures outlined in this policy.
- Sustainability Policy – applicable to all of our employees, this Sopra Steria policy explicitly commits us to preventing slavery. It also requires us to uphold human and labour rights.
- Policy for Recruitment/Agency Workers – applicable to all our employees, this Sopra Steria policy ensures 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. In the UK, a requirement to comply with the Modern Slavery Act 2015 is contained in our supplier contracts and existing suppliers will be required to comply on renewal.

3.2 Due Diligence: Processes and Practices

3.2.1 Within our own operations

We are committed to preventing slavery and human trafficking, and have a number of policies and processes in place to ensure that our employees are not being exploited and that they have a safe and supportive working environment.

In order to ensure that there is no slavery or human trafficking within our own operations we have taken the following steps:

- 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 our employment. Employees are free to serve notice at any time.
- We carry out verification of an employee's identity and ongoing right to work in the UK.
- We do not withhold any employee's identity documents or 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.

Furthermore, this year we have also started the process with Sopra Steria to becoming Living Wage accredited, and all of our employees receive at least the Living Wage Foundation wage.

A suspected case of slavery or human trafficking would be raised by an employee, using the procedures outlined in the Business Integrity Policy. To date we have not had any instances of an employee reporting a suspected case of modern slavery within our company.

3.2.2 Within our own supply chain

We recognise that our supply chain contributes the greatest risks for Slavery and Human Trafficking and as such, our relationship with the supply base is a critical part of our commitment to eliminating modern slavery. We annually procure around £30m of goods and services through our supply chain, of which 97.9% is with organisations in the UK, 1.9% with companies within the European Union and North America and 0.2% from the rest of the world.

Key categories of spend comprise:

- IT and Telecom equipment.
- Consultancy and Contractors.
- Travel and General Services spend including Hotels and Airlines.

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:

- A sustainability assessment for every new supplier during the on boarding process, which includes acceptance of our Supplier Code of Conduct. This prohibits slavery and human trafficking, and requires them to take proactive steps to ensure that slavery and human trafficking do not occur in their operations or supply chains, and the provision of evidence of their sustainability processes and policies.
- Working with suppliers, informing them of best practise, providing advice and guidance on their approach and working with them on implementing action plans for improvements.
- 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.
- Reviewing modern slavery during multiple stages of the procurement process including tender evaluation, contract award and in-life contract management.
- Becoming 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.

This year we have also taken the following steps:

- We have increased our commitment to fulfilling the prompt payment code. We currently pay 97% suppliers in accordance with its principles.
- We have introduced clauses around debt bondage (the most common form of modern slavery), into our supplier code of conduct. These clauses prevent forced work to pay off debts.
- This year we will introduce full electronic invoicing to all suppliers. This will help to improve the payment progress and help us to ensure that all suppliers are paid within 30 days.

At NHS SBS we use a Sustainability Risk Matrix, which covers more than a dozen key sustainability risk areas and determines levels of risk by supply category. Using the Sustainability Risk Matrix we broadly map the supply chain to assess particular products or geographical risks of modern slavery and human trafficking. We identify suppliers in categories. Suppliers with higher levels of risk, and those that we maintain spend above a certain threshold. They then participate in our supplier enhanced engagement process, which includes a more thorough assessment of their sustainability management processes, including those for the prevention of slavery and human trafficking.

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

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.

This year we have introduced a robust training and awareness programme for all employees, which includes:

- In 2020 a Modern Slavery communications campaign to highlight the issue to all of our employees is being planned. This will be supported by the introduction of a Modern Slavery Online training module, which covers the International Labour Organisation's (ILO) Forced Labour Indicators.
- 2020 this training module will become compulsory for all employees, and all new starters to NHS SBS will be asked to complete this as part of their induction process

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 – all of the KPI's were met or exceeded in 2019.

- Supplier engagement:
 - 100% of our suppliers to have agreed to the supplier code of conduct.
 - 100% of new suppliers have undergone a sustainability assessment during the on boarding process.
 - Deliver an internal awareness campaign annually to all employees regarding modern slavery including how to spot the signs and how to report issues.
- Modern Slavery Training:
 - Ensure that 100% of all inductions introduce employees to the topic of modern slavery.
 - 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. This was achieved in 2019.

5. Responsibility

Responsibility for our initiatives addressing slavery and human trafficking are as follows.

5.1 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 slavery and human trafficking in our supply chain and for the Sustainability Risk Matrix.

5.2 Due Diligence:

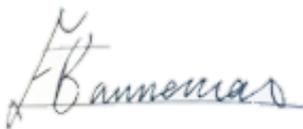
At NHS SBS the Human Resources team are responsible for ensuring that all due diligence checks are undertaken during all the stages of employment, from initial recruitment onward.

In our Procurement and supply chain management activities, our 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 teams.

6. Board Approval

NHS Shared Business Service's Board of Directors has approved this statement for the Financial Year ending on 31st December 2019.

Director's signature:



Director's name:

Erika Bannerman

Date 16th November 2020