



Shared vision.  
**Better together**

Shared Business Services

# Modern Slavery Statement 2021

# NHS SBS MODERN SLAVERY STATEMENT

## 2021

### 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 the entire NHS SBS family embraces 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 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 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, United Kingdom. NHS SBS is a unique joint venture 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.

**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.

**In the last reporting year, we have reviewed and updated our Sustainable Procurement Policy, and improved our Diversity and Inclusion Policy**

- **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.
- **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.
- **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.
- **Recruitment and Selection Policy** – Our business 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.

- **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.

## 4. Due Diligence: Processes and Practices

### 4.1. Within SBS Operations

We are committed to preventing slavery and human trafficking and have several policies and 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.
- We are a Living Wage accredited organisation and pay all our employees, (at least the Living Wage Foundation wage, as a minimum.

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

- Engaged with Not-For-Profit organisation STOP THE TRAFFIK to support our Modern Slavery workstream and educate our team members
- Held a training workshop with NHS SBS Executive Committee to outline the risks and mitigations of Modern Slavery and Human Trafficking in the healthcare Industry
- Invested In a team to support this workstream and drive action across our business



**Any suspected case of Modern Slavery or Human Trafficking can be raised by an employee, using clear procedures provided in the Business Integrity Policy**

**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 training session on Modern Slavery with our partner STOP THE TRAFFIK**

**To date we have not had any employee reports of a suspected case of Modern Slavery within NHS SBS**

#### **4.2. Within 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 £20M 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:

- Information Technology (IT) and Telecommunications equipment.
- 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:

- A sustainability assessment during the on-boarding process, which includes acceptance of our Supplier Code of Conduct. This prohibits 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, as well as requesting the provision of evidence of their sustainability processes and policies that support this goal.
- If there is a suspected case of Modern Slavery in our supply chain. We will work with our suppliers to investigate and ensure the correct procedures to be followed within a given time. 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.
- As a signatory of the Prompt Payment Code, we can reduce the pressures on suppliers that could lead to Modern Slavery.
- 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

In this financial year we have also:

- Utilised electronic invoicing to all suppliers. This helps to achieve our goal to pay all suppliers to terms
- Improved the way our Modern Slavery Policy is made available to workers in our supply chain. There are now dedicated pages on our 'Working with Suppliers' link on our external website. This includes information on what to do if there is a suspected case of Modern Slavery
- Added our Statement to the Modern Slavery Statement Registry to ensure complete transparency of our operations

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.

## **5. 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. Therefore, we have undertaken the following activities within education and awareness building.

- Training sessions for employees who have 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.
- In 2020 we introduced a Modern Slavery training module that is compulsory for all employees, contractors and agency supplied staff. All new starters complete this as part of their induction process which includes indicators of Forced Labour (ILO's).
- To continue building awareness in 2021, we undertook training session for NHS SBS executive committee, run by Not-for-Profit STOP THE TRAFFIK on the risks and mitigations of Modern Slavery In the healthcare Industry

## 6. 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 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.
- 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.

## 7. 2021 Enhancements

In 2020 NHS SBS committed to deliver the following enhancements to our Modern Slavery approach and activities. The below outlines the actions we have taken in 2021 deliver against 2 key priorities:

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

Actions:

- We have Invested in a Sustainability and Social Value team within 2021, which includes an experienced employee within sustainable procurement. This team are now responsible for ensuring ethical procurement within our organisation alongside the Sopra Steria Procurement team
- We have implemented a new Sustainability and Social Value Champions Network who engage and feedback to our NHS SBS executive committee. They are also responsible for sharing information such as the risks of modern slavery.
- We have upskilled our executive team through Not-For-Profit STOP THE TRAFFIK by delivering a workshop education session on Modern Slavery In the healthcare Industry

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

Actions:

- We have Invested In a procurement platform within NHS SBS that will support our ability to undertake risk assessments on our suppliers and supply chains, gather supplier data and monitor modern slavery risk
- We have deepened our understanding of modern slavery by partnering and working with Not-For-Profit STOP THE TRAFFIK who will continue to support us to build our Modern Slavery workstream into 2022 through training, awareness raising and mitigation measures

## 8. 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, 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.

## 9. Board Approval

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

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 2022**



## **NHS Shared Business Services Limited**

Registered in England, No. 5280446

Registered address: Three Cherry Trees Lane, Hemel Hempstead, Hertfordshire, HP2 7AH

### **ABOUT US**

NHS Shared Business Services (NHS SBS) was created in 2004 by the Department of Health and Social Care (DHSC) to deliver corporate services to the NHS. A unique joint venture with Sopra Steria, a European leader in digital services and software development, we make life easier for NHS employees, patients and suppliers, and deliver value for money to the taxpayer.

Proud members of the NHS family, we provide finance & accounting, procurement and workforce services to more than half the NHS in England. Sharing common values and unity of purpose with the rest of the NHS family, our solutions are underpinned by cutting-edge technologies and our teams' expertise, in-depth understanding of the NHS, and commitment to service excellence.

For more information, please visit [www.sbs.nhs.uk](http://www.sbs.nhs.uk)