

## **Changes in this version**

New BLP.

## **Board Level Policy**

### **1. Policy Purpose**

NHSBT fully supports the Government objective to eliminate modern slavery and human trafficking. We are committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses as outlined in the Modern Slavery Act <https://www.legislation.gov.uk/ukpga/2015/30/contents>

### **2. Scope of Application**

#### **Introduction:**

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. NHSBT are committed to acting ethically and with integrity to ensure modern slavery is not taking place anywhere within NHSBT, or in any of our supply chains. NHSBT buys c. £285m of goods and services annually. Commercial is accountable for all non-pay expenditure and its role is to enable the organisation to obtain best value for money.

#### **How NHSBT support this:**

We value the people that work for us:

- We follow the NHS Employment Check Standards when recruiting including confirming the identities of all new employees and their right to work in the United Kingdom.
- We pay our employees above the National Living Wage.
- Our Dignity at Work, Grievance, Safeguarding and Whistle-blowing policies provide a platform for our employees to raise concerns about poor working practices.

#### **We ensure confidence in our supply chain:**

Commercial ensures supplier compliance of the Modern Slavery Act 2015 by using mandatory exclusion questions during the supplier selection stage.

- We apply NHS Terms and Conditions, when awarding contracts, and this requires suppliers to comply with the relevant legislation.
- The Commercial team are aware of the Modern Slavery Act, through the Commercial Handbook, and can raise issues or concerns to management.
- We ensure supplier compliance with the relevant legislation throughout the whole-life of contract through its contract reviews process.

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### **3. Policy statement and detail**

**Approach:**

Our overall approach will be governed by compliance with legislative and regulatory requirements and the maintenance and development of good practice in the fields of contracting and supply chain management. This will be achieved by following a best practice due diligence framework developed by the Ethical Trading Initiative (ETI) which is outlined as follows:

1. Assess actual and potential human rights risks
  - Review country risks
  - Map supply chains and services and prioritise
  - Identify risks to workers by sector, nature of work, type of worker, employment relationships and labour market dynamics
  - Identify direct and indirect causes and impacts
  - Review HR systems, contracting and recruitment
  - Assess workers' ability to access rights to freedom of association and collective bargaining
2. Identify leverage, responsibility and actions
  - Assess scale and scope of corporate responsibility, including direct and indirect labour rights impacts
  - Assess leverage with suppliers, agents and contractors
  - Review sourcing strategies and purchasing practices
  - Establish benchmarks and rules for monitoring improvements or termination with suppliers
  - Review supplier capacity to manage labour risks
  - Review policies and procedures to enable workers to access their right to organise and bargain collectively
3. Mitigate risk and remediate workers
  - Take immediate steps to mitigate human rights abuses
  - Provide remediation for workers (avoiding further harm)
  - Identify and act on changes to working practices
  - Enable workers to access their right to freedom of association and collective bargaining
  - Provide training and capacity building on worker-management communication and negotiation
  - Engage / collaborate with others (e.g.: NHS Supply Chain, London University Purchasing Consortium, supplier, trades unions, government agencies, NGOs, experts, multi-stakeholder initiatives)
4. Monitor, review, report and improve
  - Track mitigation and remediation actions
  - Review decision making, responsibility and accountability - (especially at senior levels)
  - Review information sources and systems – ensure evidence is credible, verifiable and relevant
  - Analyse evidence, learn, lessons, prioritise next actions and long-term prevention
  - Communicate internally and with business partners on human rights due diligence
  - Report publicly on steps taken to respect human rights and prevent modern slavery
  - Build partnerships and collaborative action

**Compliance with the Policy:**

NHSBT will demonstrate compliance with this policy:

- We will ensure it can be achieved as part of business as usual practice and it is not resource hungry or onerous to collect, analyse and present.
- Adopt the systematic approach of 'ISO20400 – Sustainable Procurement' to ensure and promote continuous improvement.

**Embedding behaviour:**

NHSBT should review and ensure that all other relevant / potentially impacted areas should have policy reviews, including but not limited to:

- Supplier Code of Conduct
- Supplier sub-contracting processes / supply chain management processes
- Safeguarding
- Recruitment
- Whistle blowing
- Counter Fraud

## **4. Roles and responsibilities**

As specified in the individual documents listed in Section 7: Related Policies and Procedures

## **5. Training and awareness**

All individuals who are required to comply with this Policy will have access to the policy and will be provided with guidance in relation to elements relative to them as outlined in Section 7: Related Policies and Procedures.

## **6. Reporting in relation to policy**

Section 54 of the Modern Slavery Act 2015

(<https://www.legislation.gov.uk/ukpga/2015/30/section/54>) outlines requirements to:

- Prepare a slavery and human trafficking statement for each financial year of the organisation, which NHSBT published as part of the Annual report.
- Publish in a prominent place on external website a slavery and human trafficking statement.

## **7. Related policies and procedures**

POL181: NHSBT Environment and Sustainability Statement

POL227: Sustainable Procurement

MPD148: The Procurement Process – Guidance Notes for NHSBT Directorates

MPD954: Environment and Sustainability - Roles and Responsibilities

POL182: Safeguarding and Prevent: Management of the Vulnerable and at-Risk Policy

MPD961: Safeguarding and Prevent

POL372: Supplier and Contract Management

MPD1715: Supplier and Contract Management

## 8. Policy Review and Compliance Monitoring

Element/Activity being monitored	Lead/roles	Reporting arrangements and frequency	Recommendations/actions
Policy review	Company Secretary	Audit, Risk and Governance Committee  Annually	The policy will be reviewed subject to new or amended pertinent legislation/ guidance published and/or evolution in best practice.
Assurance on Compliance	Company Secretary	Audit, Risk and Governance Committee  Annually	The reporting requirements will be reviewed subject to new or amended pertinent legislation/ guidance published and/or evolution in best practice.
Policy/process effectiveness	Company Secretary	Audit, Risk and Governance Committee  Annually	Annual report on effectiveness of policy/processes
Breaches	Company Secretary	Audit, Risk and Governance Committee  As and when they arise	Appropriate action will be taken

## 9. Version Control and RACI view

Version	Owner	Approved by and basis of changes	Approved Date	Effective Date	Date of Next Review
1	Assistant Commercial Director	Initial version of Policy:  Commercial Director Chief Finance Officer ARGC Board	TBC	01/08/2024	01/08/2025
2	Assistant Commercial Director	Initial version of Policy:  Commercial Director Chief Finance Officer ARGC Board	TBC	01/07/2025	01/07/2026

# BLP3/2– NHSBT Modern Slavery Statement & NHSBT Modern Slavery Policy (Supply Chain)



Blood and Transplant

Copy No:

Effective date: DRAFT

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(R) Responsible	Assistant Commercial Director
(A) Accountable	Chief Finance Officer
(C) Consultees	All Board members and Staff
(I) Informed	All Board members and Staff