NHS
Blood and Transplant

Board Meeting in Public

Tuesday, 29 September 2026

Title of Paper	NHSBT Modern Slavery Statement & Modern Slavery Policy (Supply Chain)	**Agenda No.**	4.2
Nature of Paper	☒ Official	☐ Official	
Author(s)	Claire Gallant, Senior Commercial Lead		
Lead Executive	Carl Vincent, Chief Financial Officer (CFO)		
Non-Executive Director Sponsor	Ian Murphy		
Presenter(s) at Meeting	Carl Vincent, Chief Financial Officer (CFO)		
Presented for	☒ Approval ☐ Assurance	☐ Information ☐ Update	
Is there a plan to communicate this to the organisation?	☒ Yes ☐ No ☐ Yet to be determined		

Executive Summary

This policy is presented for approval. It establishes NHSBT's approach to identifying, assessing, managing and mitigating modern slavery risks across its supply chains. It supports the NHSBT Modern Slavery Statement and aligns with current legislative and regulatory requirements, including the Modern Slavery Act 2015, Procurement Policy Note (PPN) 02/23, the Procurement Act 2023 and the NHS (Procurement, Slavery and Human Trafficking) Regulations 2025.

The policy introduces a structured, risk-based approach embedded throughout the commercial lifecycle. For medium and high-risk procurements, enhanced supplier due diligence will be undertaken, including assessment of modern slavery controls, supply chain transparency and remediation arrangements. High-risk procurements will also utilise Social Value requirements and strengthened exclusion grounds available under the Procurement Act 2023. The policy formalises ongoing monitoring arrangements.

Approval of this policy will ensure NHSBT meets emerging regulatory obligations and demonstrates its commitment to ethical procurement and the prevention of modern slavery.

Previously Considered by

Audit, Risk and Governance Committee – Approved on 23 July 2026

Recommendation

The Board is asked to approve the updated policy

Risk(s) identified (Link to Board Assurance Framework Risks)

The Modern Slavery Policy potentially links to our Supplier Disruption Risks, and our People Staffing risk.

The updated risk-based policy is consistent with best practice. There remains some risk particularly with our supply chain where we have multiple layers of sub-contractors, but this is compliant because we are taking reasonable measures to avoid supporting modern slavery.

Strategic Objective(s) this paper relates to:

☒ Collaborate with partners	☐ Invest in people and culture	☐ Drive innovation
☐ Modernise our operations	☐ Grow and diversify our donor base	

Appendices	