
NHSBT Modern Slavery Statement

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.

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.

Policy

Who should use this policy?

Everyone working at NHSBT should use this policy, particularly anyone involved in activities related to activities with expenditure with third parties ~~(circa £327,000,000 per year).~~

What is modern slavery?

Modern slavery is often a hidden crime involving one person denying another person his or her freedom. It includes slavery, servitude, forced and compulsory labour and human trafficking.

NHSBT Modern Slavery policy is grounded in:

- The Modern Slavery Act 2015 (the Act)

The Act combats modern slavery in the UK by consolidating and clarifying modern slavery offences to be used to penalise offenders and provide greater support and protection for victims

- PPN 02/23 Tackling Modern Slavery in Supply Chains

The PPN requires in scope organisation to manage risks of modern slavery in their supply chains.

- NHS (Procurement, Slavery and Human Trafficking) Regulations 2025 that came into force on 17 May 2026

These regulations require all public bodies procuring for NHS purposes in England to assess and mitigate modern slavery risks throughout the procurement lifecycle.

How NHSBT delivers its commitments to the modern slavery statement above

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.

Objective

The purpose of this document is to enable staff engaged in activity with third parties to identify and manage any risks and instances of modern slavery.

Changes in this version

- Commercial life-cycle approach
- Risk assessment at Category level
- Compliance with Procurement Act 2023 PPN 02/23 and the NHS (Procurement, Slavery and Human Trafficking) Regulations 2025.
- Risk management via NHSBT e-procurement risk assessment tool (Atamis) commercial risk register, Business Case and commercial strategy
- Introduction of KPIs
- Course of action in case of modern slavery instances

NHSBT Modern Slavery Policy (Supply Chain):

1.1 Introduction:

This policy has been developed to support the NHSBT Modern Slavery Statement. This policy outlines key steps that NHSBT intends to take to prevent, manage and mitigate human rights abuses in our supply chains.

1.2 Approach:

Our is 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 best practice guidance developed by Cabinet Office and the Department of Health and Social Care throughout the commercial life-cycle.

1.2.1 Risk assessment

An initial risk assessment must be carried out to understand the overall risk of modern slavery related to a procurement. NHSBT Commercial will carry out the risk assessment at category level first, using the established risk assessment tool built into the e-Procurement system (Atamis).

The risk assessment tool provides an overall rating of low, medium or high which is scored based on considering six core characteristics (set out in the PPN), which together indicate where there might be a heightened risk of exploitation. The six characteristics are:

- Industry type
- Nature of workforce
- Supplier location
- Context in which the supplier operates
- Commodity type
- Business/supply chain model

Table 1 provides more details on each of these characteristics.

Any procurement carrying a high risk of modern slavery must be included in the commercial risk register.

~~The outcome of this assessment must also be included in the business case of each individual procurement, and in the commercial strategy approval document.~~

1. Industry Type	2. Nature of Workforce	3. Supplier Location
Industries characterised by the nature of work outlined in this table (often those that involve raw materials), are labour intensive and are considered high risk and include: • Agriculture • Mining • Fishing and fisheries • Construction • Electronics manufacture • Textiles, including production • Food processing • Services such as hospitality, security guarding, cleaning and	High-risk characteristics associated with the nature of the workforce include: • Reliance upon low-skilled or unskilled labour – typically work that is low-paying and undervalued and often undertaken by vulnerable workers. • High numbers of temporary, seasonal or agency workers – worker vulnerability is heightened by employment uncertainty. Women workers	Although modern slavery can occur anywhere in the world, there are some countries where the risk is predicted to be higher. You should consult the United States' Bureau of International Labor Affairs (ILAB) List of Goods Produced by Child Labor or Forced Labor U.S. Department of Labor . The list allows you to search by commodity and provides details of the source counties where there are risks of child or forced labour.

catering • Logistics, including warehousing and transport • Healthcare, social care	and children are particularly vulnerable. • Dangerous or physically demanding work. • Isolation of workers – due to working in rural locations, being home-based or in unmonitored and unregulated environments	The Global Slavery Index Walk Free contains national estimates calculated by the Walk Free Foundation, on the basis of a predictive model that accounts for individual and country-level risk factors. Suppliers from these countries can often be part of supply chains within the UK. You should consult the index to ascertain if the supplier's location features in the list of high risk countries.
4. Context in which the supplier operates	5. Commodity Type	6. Business/supply chain model
Inadequate labour laws and regulations in the country of origin with little or no-enforcement. Presence of cheap labour and high numbers of vulnerable workers – this may include women, children and young workers, migrants, minorities, groups with a history of discrimination or exclusion of workings with disabilities. Absence of effective grievance mechanisms and representative workers. Organisations/collective agreements, in some situations workers are discouraged or prevented from joining an independent trade union. In others, collective agreements are reached between a 'ghost' union and an employer with no consultation with workers – these are known as protection contracts. A lack of business and/or government accountability. Widespread discrimination against particular groups eg women or certain ethnic groups. Wars/conflicts. High level of poverty and unemployment.	The United States' List of Goods Produced by Child Labor or Forced Labor comprises 204 goods from 82 countries, as of September 5, 2024. The list provides details of goods and their source countries which it has reason to believe are produced by child labour or forced labour in violation of international standards, for example; • Polysilicon; China • Rubber gloves; Malaysia Additionally, the Global Slavery Index highlights that for the UK, the top 4 imported products at risk of forced or compulsory labour are; • Garments • Electronics • Fish • Textiles The Global Slavery Index 2023 has also identified the top 15 products at risk of modern slavery imported into the G20 by source countries.	• Subcontracting and complex supply chains – the larger and more complex the supply chain, the harder it is for organisations to know about conditions for workers in their supply chains. • Complex employment relationships with a reliance on agency, outsourced or subcontracted workers adds another layer of separation between employers and workers, leaving workers exposed to unethical practices. • Use of labour recruiters in supply chains – recruitment and hiring through labour brokers can increase the risk of trafficking and forced labour due to the prevalence of corrupt practices and recruitment fees. • Purchasing that is predicated only on a profit margin matrix (i.e. rapid turnaround times/high flexibility for production/low margins for large quantities of goods, depending on unreliable trends – can leave workers vulnerable to exploitative practices).

1.2.2 Pre-Procurement

Early market engagement

Where a medium or high risk of modern slavery has been identified, Commercial will engage the market to understand how market players are dealing with the risk. Commercial will then use this market intelligence to understand the appropriate information to be requested from suppliers either at selection stage or part of contract management.

Specification drafting

Commercial and the business will use the risk assessment and market engagement outputs to design a specification that proportionally accounts for the risk, for example inclusion of ethical and labour standards in the specification.

1.2.3 Selection stage

For procurements assessed as medium or high risk, NHSBT may require suppliers to provide additional evidence demonstrating how modern slavery risks are identified, managed and mitigated within their operations and supply chains. This may include modern slavery statements, supply chain mapping information, supplier due diligence processes and corrective action plans where concerns have been identified. The level of assurance requested will be proportionate to the nature, value and risk profile of the procurement.

Mandatory exclusion grounds are included in the standard selection questionnaire (SSQ) relating to modern slavery offences. These are applied as per Regulation 57 of the Public Contract Regulations 2015 to all procurement commenced before 24 February 2025. For procurement commencing on or after 24 February 2025 the Procurement Act 2023 applies. With Schedule 6 this Act outlines several mandatory exclusion grounds for suppliers, including in relation to Modern Slavery.

High risk procurements

Where a procurement is assessed as high risk, additional mandatory exclusion grounds must be considered. The Procurement Act 2023 introduces several updates to the Standard Selection Questionnaire (SSQ) to enhance the due diligence process which will be used proportionally as a risk mitigation tool:

- a. **Mandatory and discretionary Exclusion Grounds:** The Act revises the exclusion grounds in Part 2 of the SSQ, providing clearer guidelines on mandatory and discretionary exclusions;
- b. **Health and Safety:** New questions related to health and safety have been added to ensure suppliers meet necessary standards;
- c. **Modern Slavery and Carbon Emissions:** Additional requirements for modern slavery compliance and questions related to reducing carbon emissions have been incorporated;
- d. **Self-Declarations:** The format for responses to exclusion questions has been updated to self-declarations rather than simple yes/no answers.

1.2.4 Award stage

Where there is high risk of modern slavery, the application of the social value model must be applied to bolster NHSBT risk mitigation efforts. Modern slavery is set out in theme 4 in the social value model to: "Demonstrate action to identify and manage the risks of modern slavery in the delivery of the contract, including in the supply chain." The social value model (as published in PPN 06/20) asks suppliers to provide additional benefits outside of the core requirement of the contract. The social value model does not replace any of the other activities carried out in relation to modern slavery risks, and Bidders may be asked to explain and provide evidence for appropriate processes to manage and mitigate risk of modern slavery for tender evaluation.

1.2.5 Contract Management

Considerations of modern slavery risks are embedded into contract management processes and must be followed for all new contracts awarded on or after 4 August 2025.

Modern slavery risks must be continually managed in the same way as any other risk:

- Commercial must log the risk in the commercial risk register, monitor developments and mitigate against materialisation of the risk.
- The risk must be included as standard agenda item when engaging with suppliers both as part of contract reviews as well as Supplier Relationship Management reviews
- If deemed appropriate, NHSBT may consider terminating the contract in accordance with its terms and conditions.

The risk assessment tool outcome (1.2.1) must be reviewed annually to ensure the contract is categorised correctly as part of regular contract management reviews.

1.2.6 How to manage instances of modern slavery

If an instance of modern slavery occurs post contract award, NHSBT will take the following course of action:

a. Investigate and assess the situation

- Understand the nature and severity of the incident.
- Engage with the supplier and request evidence, and explanation.
- May bring in specialists to conduct an ethical audit or interviews with affected workers.
- An emergency committee chaired by the Commercial Assistant Director of Contracts and Supplier Relationship Management established to ensure the incident is managed appropriately.

b. Remediate the issue

- Develop clear steps with the supplier to fix the problem and regularly monitor the action plan to ensure the remedial actions are delivered in a timely manner.
- NHSBT may decide to terminate the contract and re-procure the goods or services from a different supplier

Compliance with the Policy

NHSBT will demonstrate compliance with this policy by achieving the following KPIs:

- ~~— All high risks of modern slavery are reported in the commercial risk register~~
- ~~— All high risks of modern slavery in the risk register are updated every 6 months~~
- All staff will be trained on the policy annually
- All high-risk procurements have a documented modern slavery risk assessment completed and retained.
- All corrective actions arising from identified modern slavery concerns are monitored and completed within agreed timescales.

The above KPIs will be monitored by the Commercial ~~Senior Management Team~~ Operations Team ~~every quarter~~ annually.

Any instance of modern slavery is to be reported immediately to Commercial Operations.-

Annual Assurance Reporting

~~NHSBT Commercial Operations will prepare an annual Modern Slavery Assurance Report for the Commercial Senior Management Team. The report will summarise high-risk categories, risks recorded on the Commercial Risk Register, mitigations implemented, supplier incidents, corrective actions undertaken, and compliance with training requirements. The report will also identify emerging risks and opportunities for continuous improvement in NHSBT's approach to tackling modern slavery risks within its supply chains.~~

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

Endorsement

This Policy is supported, endorsed and approved by the NHSBT Executive Team.

Definitions

PPN = Procurement Policy Notice

Related Documents / References

1. MPD1739 – Sourcing & Procurement
2. POL372 – Supplier & Contract Management
3. MPD1715 – Supplier & Contract Management