



NHS England and NHS Improvement Modern Slavery and Human Trafficking Statement 2022/23

1. Organisational Structure and supply chains

NHS England and NHS Improvement provides system leadership across the NHS in England. We share out more than £100 billion in funds each year and hold organisations to account for spending this money efficiently and effectively for patients and for the taxpayer. We operate through central and regional teams and host other support services, operating as a single organisation. We also work closely with partner organisations that provide regulatory and support services to the health and care system.

Further details about what we do can be found on [our website](#).

2. Policies in relation to Modern Slavery and human trafficking

NHS England and NHS improvement fully supports the Government's objectives to eradicate Modern Slavery and human trafficking and recognise the significant role the NHS has to play in both combatting it and supporting victims. This includes being strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

As part of the NHS Net Zero commitment outlined in the 2020 "Delivering a 'Net Zero' National Health Service" report, we have published the NHS Supplier Roadmap. More information can be found [here](#). As part of the roadmap, a Sustainable Supplier Assessment will be available in 2023 to enable suppliers to benchmark their progress against the Roadmap. Suppliers will perform an annual self-assessment, which will also include Modern Slavery requirements. Requirements of suppliers include, but are not limited to, publication of an ethical sourcing policy, completion of a supply chain risk assessment and Modern Slavery audits in supply chain hotspots identified through risk assessments.

The NHS standard contracts which NHS England publishes, govern how we engage with our suppliers and require compliance with relevant legislation, including the Modern Slavery Act 2015. The 2022 updates to these contracts strengthen our position on Modern Slavery, extending requirements and the option to terminate for breaches of social and labour laws.

We also have a number of complementary internal policies that support our commitment to eradicating Modern Slavery, such as:

- Freedom to Speak up Whistleblowing Policy
- Managing Safeguarding Allegations Policy
- Safeguarding Policy
- Procurement Policy

We are also Prescribed Persons under the Public Interest Disclosure (Prescribed Persons) Order 2014, meaning primary care staff working at GP surgeries, opticians, pharmacies and dental practices can raise concerns about inappropriate activity with us directly. We assign any concerns for further investigation and offer support to individuals that have suffered any detriment as a result of whistleblowing.

3. Due diligence process

We have adopted central government's Social Value Model (Procurement Policy Note 06/20), which requires a minimum 10% weighting in all procurements dedicated to Net Zero and Social Value, including the elimination of Modern Slavery. As of 1st April 2022, all NHS organisations will be required to adopt PPN06/20 and specific guidance on how to apply the Social Value Model to healthcare settings is provided.

4. Risk assessment and Management

We support NHS organisations to use the UK Government's Supplier Registration Service to undertake both Modern Slavery and Labour Standard Assessments where thorough risk assessments indicate if a category or country is high risk.

Our Sustainable Supplier Assessment, available in 2023, will include a requirement for suppliers to publish an ethical sourcing policy, supply chain risk assessment and conduct Modern Slavery audits in hotspot areas of their supply chain.

5. Effectiveness

We are committed to the following actions to further improve our effectiveness for the coming year:

- Develop a new strategy to eradicate Modern Slavery across the NHS supply chain, including improving the mapping of our supply chain to better understand the risk profile of key suppliers
- Further enhance our supplier vetting process, framework qualification/disqualification process, and e-procurement platform criteria to ensure we have a robust, risk-based approach to the Modern Slavery risks in onboarding suppliers
- Increase auditing of suppliers whose own supply chains may be more at risk of modern slavery
- Continue to engage with NHS organisations through workshops, webinars and other events to increase awareness of Modern Slavery risks and help to upskill our stakeholders
- Further analyse our procurement categories to identify areas more at risk of modern slavery and create category-specific guidance where needed

6. Training

We invest in appropriate training to ensure staff are aware of and able to respond to incidents of Modern Slavery within care settings.

We are working collaboratively across government and taking a public health approach to the prevention of Modern Slavery and the protection of the health of survivors, raising wider awareness and ensuring consistency of approach. Further details can be found on [our website](#).

Amanda Pritchard, Chief Executive, NHS England and NHS Improvement
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