



NHS England and NHS Improvement Slavery and Human Trafficking Statement

NHS England and NHS Improvement provides system leadership across the NHS in England. We commission and oversee services worth more than £100 billion and hold organisations to account for spending this money effectively for patients and efficiently for the tax payer. 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](#).

Current policies and initiatives

NHS England and NHS improvement fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role the NHS has to play in both combatting it and supporting victims. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses. Steps taken to date include:

People

- Our Respect at Work, Grievance and Voicing your Concerns for Staff policies give a platform for our employees to raise concerns about poor working practices.
- We have been using social media to raise awareness and there has since been investment in training to ensure front line practitioners are aware of and able to respond to incidents of modern slavery within care settings.
- We have sustained close links with the Independent Anti-Slavery Commissioner and the UK Modern Slavery Unit to ensure the NHS is able to play a full part in eradicating Modern Slavery from the UK.
- We are working collaboratively across government taking a public health approach to the prevention and protection of the health of survivors of modern slavery working closely with Public Health England.
- We have been collaborating very closely with 'Stop the Traffic' to share and understand their place-based data to inform health care planning and delivery of services.
- We are supporting an NHS modern slavery network so that health care professionals can share best practice and work to support the identification, care, treatment and safeguarding of victims and survivors of modern slavery in health settings.
- We confirm the identities of all new employees and their right to work in the United Kingdom, and pay all our employees above the National Living Wage.

Whistleblowing in the NHS

- We are a Prescribed Person 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 fiscal or professional detriment as a result of whistleblowing.

Procurement and our supply chain

- Our procurement approach follows the Crown Commercial Service (CCS) standard and includes a mandatory exclusion question regarding the Modern Slavery Act 2015.
- When procuring goods and services, we additionally apply NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with relevant legislation.
- To date all Commercial and Procurement staff have received training on ethical and staffing issues in procurement. Ethical and staffing issues form a key part of our induction for new entrants to the Commercial team.
- The NHS England Business Case approval process includes a question on Social Value which must be considered before the budget for a proposed procurement is approved. This question is supported by explanatory narrative, which makes direct references to staff rights and the Modern Slavery Act.
- Our procurements undergo a sustainability risk assessment, which includes modern slavery and labour risks as one of the six (6) risk areas explored. This is part of our contract segmentation tool and we have made it a requirement for procurements over competition thresholds.
- In 2020/21, we invited a number of our gold suppliers, not already captured by CCS due diligence, to complete the government's Modern Slavery Assessment Tool, and we will be working with them to manage any areas of exposure identified.

Review of effectiveness

We intend to take further steps to identify, assess and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in our supply chains.

In 2021/22, our anti-slavery programme will also:

- continue to support all NHS staff to understand and respond to modern slavery and human trafficking, and the impact that each and every individual working in the NHS can have in keeping present and potential future victims of modern slavery and human trafficking safe.
- ensure that NHS staff have access to training, supported by Health Education England (HEE), on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information and will

help staff develop the skills to support individuals who come into contact with health services.

- work with NHS funded organisations to ensure modern slavery and human trafficking are taken seriously and features prominently in safeguarding work plans.
- review NHS England safeguarding policies and training programmes to ensure that Modern Slavery and human trafficking reflect potential requirements in pending reforms relating to the pre-criminal needs of people involved in human trafficking and modern slavery.
- undertake further risk assessments on transparency in supply chain including an overview of products, services and suppliers procured.

Further details can be found on [our website](#).

Sir Simon Stevens, Chief Executive, NHS England

March 2021

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to NHS England, including Commissioning Support Units.

