

# Modern Slavery Act Transparency Statement

## Introduction to the Company

This statement is made pursuant to s.54 Modern Slavery Act 2015 and sets out the steps that City Hospitals Independent Commercial Enterprises Limited (Choice) has taken to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

Choice is a commercial business providing services to NHS organisations and its primary customer is South Tyneside and Sunderland NHS Foundation Trust. The company operates across three locations and is organised into three business units; outpatient pharmacy, estates and facilities management, and procurement.



## Our Policies

Choice is committed to ensuring that there is no modern slavery or human trafficking in any

part of our business activities or supply chain. As an organisation operating and providing services to public sector clients we recognise that we must act ethically and with integrity in our business relationships. Implementing, enforcing and reviewing our controls on slavery and human trafficking are an integral part of our ethical trading.

To ensure that Choice's commitment to prevent modern slavery and human trafficking in its operations and supply chain, the company has the following internal policies and procedures;

- **Recruitment** – robust screening checks are undertaken to ensure that all new employees are eligible to work in the United Kingdom and are not being forced to work against their will.
- **Whistleblowing** – the company has a Whistleblowing Policy which provides employees, suppliers, customers and others with the confidence to report any concerns regarding our business activities, including issues involving modern slavery and human trafficking.
- **Procurement** – When undertaking procurement of services and goods we assess prospective supplier(s) to ensure:
  - (i) they comply with all relevant Law and Guidance and shall use Good Industry Practice to ensure that there is no slavery or human trafficking in its supply chains; and

- (ii) they shall notify Choice Senior Managers immediately if it becomes aware of any actual or suspected incidents of slavery or human trafficking in its supply chains.

The Choice Dignity at Work Policy sets out the company's commitment to promoting a safe, healthy and fair environment and a climate at work where there is dignity and respect for all staff, colleagues from other organisations and visitors. Bullying, intimidation and harassment are often present in situations involving slavery and human trafficking and the policy encourages staff to raise concerns so they can be investigated. The policy also establishes Dignity at Work Advisors who can provide a confidential advisory service to staff and signpost to appropriate support resources. The policy also recognises the key role trade unions play in supporting staff with concerns.

The company's Employment Checks Policy establishes the identity and requires other checks on new employees as well as agency workers. It is common for those involved in modern slavery and human trafficking to retain identity documents in order to exert control over victims. The company's policy requires identity documents to be provided by the employee in person and production by a third party is not accepted.

The Whistleblowing Policy recognises the importance of dealing with concerns from staff and others. The policy provides a clear procedure for raising concerns including issues such as modern-day slavery. The company also provide a confidential counselling telephone service for staff.

In relation to temporary workers and agency staff Choice uses a vetted preferred supplier list to source temporary workers.

## Due Diligence

Choice has an internal risk management process to ensure that risks are identified and



mitigated with appropriate controls implemented. As part of our risk management process we have systems in place to identify and assess potential risk areas for modern slavery and human trafficking both within our business and in our supply chain. Concerns raised through our Whistleblowing policy are investigated and those raising concerns are protected.

## Procurement and Our Supply Chain

Choice is committed to ensuring that all goods and services procured for the delivery of NHS care are free from slavery, servitude, forced labour and human trafficking. We recognise the pivotal role of procurement in preventing modern slavery across supply chains, and as a Public Undertaking, we operate in line with the statutory duties set out in the National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025, which come into force on 17 May 2026.

NHS England guidance emphasises the importance of consistent, system-wide risk management and advocates the use of pre-assured, centrally managed procurement routes wherever possible. NHS England accredited frameworks undergo rigorous due diligence and commercial oversight, helping ensure that suppliers meet required ethical, governance and social-value standards, including those related to modern slavery. Accordingly, we:

- Prioritise the use of NHS England-accredited or endorsed frameworks as our primary route to market.
- Use alternatives only where no suitable framework exists and where there is a clearly justified operational requirement.

Throughout the entire commercial life cycle, procurement design, market engagement, tender evaluation, contract award and ongoing contract management, we ensure modern slavery risks are identified, assessed and appropriately managed.

This includes:

- Applying a standardised modern slavery risk-assessment methodology (via Atamis) across all procurements to ensure consistent risk identification and proportionate mitigations.
- Taking reasonable and proportionate steps based on the level of modern slavery risk identified.
- Requiring completion of the Modern Slavery Assessment Tool (MSAT): as a condition of participation for all high-risk procurements; within three months of contract award for all medium-risk procurements.
- Ensuring that all suppliers in scope of the Modern Slavery Act 2015 provide a compliant and up-to-date Modern Slavery Statement as a condition of participation.
- Using standard NHS terms and conditions as the contractual baseline. Where these are not used, we ensure that all contracts contain robust, modern-slavery-specific clauses.
- Embedding modern slavery KPIs into medium- and high-risk contracts and monitoring compliance through scheduled contract management reviews.

## Training

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking.

Training on slavery and human trafficking training is delivered as part of Safeguarding Training (all levels) which all members of staff are required to undertake.

In addition, members of our Procurement Services team are required to complete the dedicated e-learning module 'Tackling Modern Slavery in Supply Chains', delivered through the Government Commercial College. This training strengthens understanding of modern slavery risks, supply-chain vulnerabilities and appropriate mitigation strategies, ensuring staff are equipped to discharge their responsibilities effectively.



Peter Sutton  
Managing Director

Furthermore, staff who hold professional registration with the Chartered Institute of Procurement and Supply (CIPS) undertake the annual CIPS Ethical Procurement and Supply training. This includes a focused module on human rights, covering how to identify signs of modern slavery within supply chains and the appropriate actions to take where concerns arise.

These training requirements ensure our procurement professionals consistently apply best practice, maintain high ethical standards, and remain aligned with national expectations for tackling modern slavery in NHS supply chains.

## Approval of this Statement

This statement has been approved by the Board of Directors in March 2026.



Mark Stouph  
Chair of the Board