

NHS Arden & GEM CSU Modern Slavery and Human Trafficking Statement 2024/25

1. Organisational structure and supply chains

NHS Arden & GEM Commissioning Support Unit (Arden & GEM) works with the wider NHS in England to deliver high-quality services for all.

We do this by working across the organisation and with our customers across the NHS and beyond to ensure that the healthcare workforce has the right numbers, skills, values and behaviours to support the delivery of excellent healthcare and health improvement to patients and the public.


We work with the wider NHS and our partners to optimise the use of digital technology, research and innovation, and to deliver value for money and increased productivity and efficiency.

2. Policies in relation to modern slavery and human trafficking

Arden & GEM fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role the NHS must play in both mitigating it and supporting victims. This includes a commitment to ensure our supply chains and business activities are free from ethical and labour standards abuses.

The NHS Evergreen Sustainable Supplier Assessment, launched in June 2023 and embedded within Atamis, the NHS-wide e-commerce platform, enables NHS suppliers to share their progress against the NHS [Net Zero Supplier Roadmap](#), published in 2021. The Evergreen Assessment requires action on modern slavery to progress through the maturity levels of the assessment.

The NHS aligns to the Cabinet Office Terms and Conditions for the procurement of goods and services, which govern how we engage with our suppliers and requires compliance with relevant legislation, including the Modern Slavery Act 2015. The terms and conditions are aligned to Procurement Policy Note 02/23, Tackling Modern Slavery in Government Supply Chains, and include the option to terminate for breaches of social and labour laws.



Arden & GEM adheres to internal policies that support our commitment to eradicating modern slavery, including the:

- Freedom to Speak Up policy – including ‘freedom to speak up’ Guardians
- Safeguarding policy
- [Sexual Safety in Healthcare organisational charter](#)
- [Strategic Framework for NHS Commercial](#)
- [NHS People Promise](#)

Arden & GEM is a ‘prescribed person’. That means it can receive protected disclosures, is responsible for handling cases of speaking up under the Public Interest Disclosure (Prescribed Persons) Order 2014 and must report annually on disclosures.

3. Due diligence process

When undertaking procurement activity, we use the government’s standard selection questionnaire, which has been built into our e-commerce system and includes exclusionary grounds addressing modern slavery risk.

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. From April 2022, all NHS organisations adopted PPN 06/20 and Arden & GEM has provided specific guidance on how to apply the Social Value Model to healthcare settings.

Our Safeguarding Accountability and Assurance Framework (SAAF) sets out the safeguarding roles and responsibilities of all individuals working in providers of NHS-funded care settings and NHS commissioning organisations. It supports the NHS by providing guidance and minimum standards.

4. Training

Arden & GEM follows NHSE requirements for training where all staff are required to complete a number of compulsory training modules, with awareness of modern slavery addressed through Safeguarding Children and Adults Level 1. Additional safeguarding support tools have been developed for staff groups from safeguarding leads through to the wider healthcare profession.

Evidence has shown that when victims present in healthcare services, healthcare professionals are not always equipped to know how best to support them. To help staff to recognise and respond to suspected incidents of modern slavery within the NHS, new e-learning has been created for NHS safeguarding leads. The training supports them to provide calm, clear and strategic leadership for complex cases and enables them to offer the appropriate support to frontline healthcare professionals.

The intercollegiate [Adult Safeguarding: Roles and Competencies for Health Care Staff](#) supports healthcare professionals to identify the knowledge and skills needed for safeguarding including modern slavery, setting out 5 competence levels for practitioners. Training support tools developed include:

Level 1: A free [NHS safeguarding app](#) providing an easy-access source of guidance on types of abuse, exploitation and neglect including modern slavery.

Level 2+: The NHS Learning Platform provides background and updates on safeguarding and trauma-informed practice, signposts clinicians and practitioners to the [Modern Slavery Helpline](#) for advice and provides guidance when to contact a first responder.

Notes:

CSU is an abbreviation of Commissioning Support Unit.