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4<sup>th</sup> June 2024

Dear [REDACTED]

**RE: SCCL-FOI-2024/25-029**

Thank you for your FOI request received by the FOI office for the following information:

- A list of all NHS England or NHS Supply Chain suppliers that supply products completely or partially manufactured in China which are at “high risk” or “highest risk” for modern slavery, any subcontractors for these suppliers, the specific products and their manufacturers, and an explanation for why each of those products are deemed “high risk” or “highest risk”. Such data was referred to in a UK government report. <https://www.gov.uk/government/publications/review-of-risk-of-modern-slavery-and-human-trafficking-in-the-nhs-supply-chain/review-of-risk-of-modern-slavery-and-human-trafficking-in-the-nhs-supply-chain>, and in response to a Freedom of Information Request with NHS England. In response to that Freedom of Information Request, NHS England said: “Some products supplied through NHS Supply Chain may be manufactured in China, as identified in ‘Table 4: 5 highest risk products and their supplier locations’ of the report, however NHS Supply Chain does not have any direct contracts with those factories.”
- A list of reports the NHS Supply Chain organization has itself ordered or received from third parties suggesting possible modern slavery might be occurring at any of the factories in China which supplied products through NHS Supply Chain, if such reports exist. Please provide the name of each NHS Supply Chain or NHS England supplier that used the factory for manufacturing, the manufacturer, the date the NHS Supply Chain received such a report, what follow up action (if any) was taken to individual reports, and in case an investigation was conducted, whether an investigation found allegations of modern slavery were valid or invalid.

Your request has been handled as a request for information under the Freedom of Information Act 2000 and SCCL are able to provide a response below:

To inform the report outlined in the FOI request, SCCL looked at the risk at supplier entity level - not down to individual product line. SCCL did not assess products as part of this exercise. Therefore, there is no data about products deemed high risk.

The risk methodology, i.e., why a supplier was deemed at high risk, was outlined in the report.



The risk level assigned to a supplier was based on their response to MSAT (Modern Slavery Assessment Tool) and where no MSAT response is available, an aggregated risk score was used.



## MSAT risk scoring

Suppliers were allocated a risk score of high, medium, or low based on the classification as shown in Table 1, based on their most recent available supplier MSAT score, with a specific focus on question 16: "Do you supply goods (to the buyer or buyers that invited you to complete this assessment) that have been identified by the USA Department of Labor to be at higher risk of being produced by child labour or forced labour?"

Irrespective of the score the supplier received, if they answered yes to question 16 of the MSAT they were automatically classed as high risk.

## Aggregated risk score

For suppliers without a valid MSAT, a risk matrix approach was taken, by combining risk scores for country of origin and material content or industry to create an indicative risk as shown below.

<b>GSI Country risk</b>	Low			
	Medium			
	High			
		High	Medium	Low
		<b>SRA Material Risk</b>		

The risk matrix scores were complemented by the USA's Bureau of International Labor Affairs (ILAB) List of Goods Produced by Child Labor or Forced Labor. This approach ensured a risk assessment that considered wider government views, future NHS risk assessments and complements the breadth of the Global Slavery Index (GSI) with the detail and current data of the ILAB list.

The material risk component was determined by using data from the Social Responsibility Alliance (SRA) <https://www.socialresponsibilityalliance.org/> and supplemented by risks highlighted in PPN 02/23

SCCL does not hold any information regarding a list of reports the NHS Supply Chain organisation has itself ordered or received from third parties suggesting possible modern slavery might be occurring at any of the factories in China which supplied products through NHS Supply Chain.

We hope that this response addresses your request. However, if you are dissatisfied with this response, you may request an independent internal review of our handling of your request by submitting a complaint within two months to the postal or e-mail addresses above, quoting the reference number above. If you ask for an internal review, it would be helpful if you could say why you are dissatisfied with the response.

As part of any internal review the handling of your information request will be reassessed by a member of SCCL staff who was not involved in providing you with this response. If you remain dissatisfied after this internal review, you will have a right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act.

If you require any further information do not hesitate to contact the FOI team.

Yours sincerely

FOI Team

**Supply Chain Coordination Limited**  
**Management Function of NHS Supply Chain**