



# MODERN SLAVERY ACT STATEMENT

## Slavery and Human Trafficking Policy Statement

Apr 2019

### 1. Introduction

At Chelsea and Westminster Hospital NHS Foundation Trust ('the Trust') we are committed to ensuring that no modern slavery or human trafficking takes place in any part of our business or our supply chain. This statement sets out actions taken by the Trust to understand all potential modern slavery and human trafficking risks and to implement effective systems and controls.

### 2. Organisational structure

The Trust delivers specialist and general hospital care at Chelsea and Westminster Hospital and West Middlesex University Hospital. Both hospitals have major A&E departments and the Trust also provides the second largest maternity service in England.

Our specialist hospital care includes the burns service for London and the South East, children's inpatient and outpatient services, cardiology intervention services and specialist HIV care. We also manage a range of community-based services, including our award-winning sexual health clinics which extend to outer London areas.

The Trust serves a catchment area in excess of one million people. The Trust's main health commissioning and social care partnerships cover two Sustainability and Transformation Partnership (STP) footprints and the following areas:

- West London CCG
- Hounslow CCG
- Hammersmith and Fulham CCG
- Central London CCG
- Ealing CCG
- Richmond CCG
- Wandsworth CCG
- NHS England (NHSE) for Specialised Services Commissioning

The Trust values are firmly embedded. They demonstrate the standard of care and experience our patients and members of the public should expect from any of our services. They are:

- **P**utting patients first
- **R**esponsive to patients and staff
- **O**pen and honest
- **U**nfailingly kind
- **D**etermined to develop

We are a leading Trust for teaching, training and research, with close links to Imperial College London and Imperial College Health Partners, as well as other Higher Education Institutions (HEIs).

Our supply chains enable the procurement of a wide range of goods and services on behalf of our clients and service users.



### **3. Our policy on slavery and human trafficking**

We are fully aware of the responsibilities we bear towards our service users, employees and local communities. We are guided by a strict set of ethical values in all of our business dealings and expect our suppliers (ie all companies we do business with) to adhere to these same principles. We have zero tolerance for slavery and human trafficking. Staff are expected to report concerns about slavery and human trafficking and management are expected to act upon them in accordance with our policies and procedures.

### **4. Due diligence**

To identify and mitigate the risks of modern slavery and human trafficking in our own business and our supply chain we:

- Undertake appropriate pre-employment checks on directly employed staff, and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff
- Implement a range of controls to protect staff from poor treatment and/or exploitation, which complies with all respective laws and regulations—these include provision of fair pay rates, fair terms of conditions of employment, and access to training and development opportunities
- Consult and negotiate with trade unions on proposed changes to employment, work organisation and contractual relations
- Purchase most of our products from UK- or EU-based firms which may also be required to comply with the requirements of the UK Modern Slavery Act (2015) or similar legislation in other EU states
- Purchase a significant number of products through the NHS Supply Chain, whose 'supplier code of conduct' includes a provision around forced labour
- Since January 2017, require all suppliers to comply with the provisions of the UK Modern Slavery Act (2015) through our purchase orders and tender specifications, which set out our commitment to ensuring no modern slavery or human trafficking in relation to our business
- Uphold professional codes of conduct and practice relating to procurement and supply, including through our procurement team's membership of the Chartered Institute of Procurement and Supply
- When possible and consistent with public contracts regulations, build long-standing relationships with suppliers

### **5. Training**

Advice and training about modern slavery and human trafficking is available to staff through our safeguarding children and adults training, our safeguarding policies and procedures and our safeguarding leads.

### **6. Board of Directors' approval**

This statement has been approved by the Board of Directors of Chelsea and Westminster Hospital NHS Foundation Trust, who will review and update it on an annual basis.

Further information about the Trust can be found at [www.chelwest.nhs.uk](http://www.chelwest.nhs.uk).