



MODERN SLAVERY ACT STATEMENT

Slavery and Human Trafficking Policy Statement

April 2024

1. Introduction

At Chelsea and Westminster Hospital NHS Foundation 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. We aim to follow good practice and take all reasonable steps to prevent slavery and human trafficking. We are committed to ensuring that all of our employees are aware of the Modern Slavery Act 2015 and their safeguarding duty to protect and prevent any further harm and abuse when it is identified or suspected that the individual may be or is at risk of modern slavery/human trafficking.

Section 54 of the Modern Slavery Act 2015 requires all organisations to set out the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

2. Organisational structure

Chelsea and Westminster Hospital NHS Foundation Trust is one of the top ranked and top performing hospital trusts in the UK. We employ 7,000 plus staff over our two main hospital sites, Chelsea and Westminster Hospital and West Middlesex University Hospital, and across 12 community-based clinics within North West London. We pride ourselves on providing outstanding care to a community of more than 1.5 million people.

Both hospitals have major A&E departments, treating over 300,000 patients each year. The Trust is the second largest maternity service in England. Our specialist care includes the world-renowned burns service, which is the leading centre in London and the South East and our specialist HIV and award winning sexual health care services.

In partnership with CW+ our hospital charity, we build and enhance clinical facilities to create an outstanding care environment for our patients and for our staff. We are growing our existing portfolio of innovation projects and our reputation in this field, to become a national leader for innovation within the NHS. Our expansion in robotic surgery has led to European breakthroughs, while also leading on national clinical gynaecological research, supporting our ambition to be recognised as a progressive leader in women's health.

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

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 (i.e. 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
- Provide employees with access to disclose confidentially - this includes via Safeguarding Leads, Freedom to Speak Up Guardians and Employee Assistance Programme.
- 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 and framework agreements, 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
- Undertake due diligence on suppliers as part of tendering for off-framework purchases

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 Trust's Audit and Risk Committee through agreed delegation by the Board of Directors of Chelsea and Westminster Hospital NHS Foundation Trust. The Statement will be reviewed and updated on an annual basis.