



MODERN SLAVERY ACT STATEMENT 2026/27

Chelsea and Westminster Hospital NHS Foundation Trust

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 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 an individual may be, or is at risk of, modern slavery or 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, or in any part of its own business.

From 17 May 2026, the National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025 came into force, introducing mandatory measures in England to strengthen the prevention of modern slavery. These Regulations require in-scope public bodies, including NHS trusts and local authorities procuring goods and services, to undertake modern slavery risk assessments and take reasonable steps to prevent slavery and human trafficking within NHS supply chains.

2. Organisational structure and services

Chelsea and Westminster Hospital NHS Foundation Trust is an acute and community healthcare provider, operating Chelsea and Westminster Hospital and West Middlesex University Hospital, alongside a range of community services.

The Trust employs a large and diverse workforce and procures a wide range of goods and services to support the delivery of patient care.

The Trust is a member of the North West London Acute Provider Group, a partnership with The Hillingdon Hospitals NHS Foundation Trust, Imperial College Healthcare NHS Trust and London North West University Healthcare NHS Trust. Collectively, the group operates 12 hospitals, employs approximately 33,000 staff and serves a population of more than 2.2 million people. While working collaboratively, each organisation remains statutorily independent, with a Chair in Common and a Board in Common.

Our values

Our PROUD values are firmly embedded in our organisational culture and continue to demonstrate the standard of care and experience our patients and members of the public should expect from all of our staff and services.

- Putting patients first
- Responsive to patients and staff
- Open and honest
- Unfailingly kind
- Determined to develop

3. Policies and governance framework

The Trust is committed to maintaining robust governance arrangements to prevent modern slavery and human trafficking.

We recognise 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 work in partnership with North West London Procurement Service to support these values and ensure compliance with our supply chain responsibilities.

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.

The Trust has a range of policies and procedures that support this commitment, including:

- Safeguarding Adults and Safeguarding Children policies
- Recruitment and selection policies
- Freedom to Speak Up arrangements
- Procurement and contract management processes

All staff have a responsibility to remain vigilant to the risks of modern slavery and to report any concerns. Concerns can be raised through established safeguarding processes, Freedom to Speak Up Guardians or other confidential reporting mechanisms.

4. Risk assessment and key risk areas

The Trust recognises that risks of modern slavery and human trafficking may arise in both its workforce and its supply chains, and that it may encounter individuals who are at risk of, or experiencing, modern slavery within the services it provides.

Key areas of potential risk include:

- The use of temporary and agency staff
- Outsourced and contracted services
- Supply chains involving goods sourced through national and international routes

The Trust mitigates these risks through established employment checks, procurement controls and safeguarding arrangements. The Trust works closely with procurement partners, including North West London Procurement Service and NHS Supply Chain, to ensure appropriate risk assessment, due diligence and ongoing supplier assurance.

5. Due diligence and controls

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

- Undertakes appropriate pre-employment checks for all directly employed staff. Agency staff are sourced via approved frameworks, which are subject to audit to ensure pre-employment clearances are in place.
- Implements controls to protect staff from poor treatment and/or exploitation, in accordance with applicable laws and regulations, including fair pay, terms and conditions of employment, and access to training and development opportunities.
- Provides employees with access to confidential reporting mechanisms, including Safeguarding Leads, Freedom to Speak Up Guardians and the Employee Assistance Programme.
- Consults and engages with trade unions on employment matters, including proposed changes to work organisation and contractual arrangements.
- Procures goods and services through established frameworks, including NHS Supply Chain and North West London Procurement Service, which require suppliers to meet relevant legal and ethical standards, including those relating to modern slavery.
- Undertakes due diligence as part of tendering processes for off-framework purchases and maintains ongoing supplier assurance through its procurement arrangements.
- From 17 May 2026, the NHS (Procurement, Slavery and Human Trafficking) Regulations 2025 came into force, introducing mandatory measures in England to strengthen the prevention of modern slavery. These Regulations require in-scope public bodies, including NHS trusts and local authorities procuring goods and services, to undertake modern slavery risk assessments and take reasonable steps to prevent slavery and human trafficking within NHS supply chains.
- Utilises the Modern Slavery Assessment Tool (MSAT) for suppliers identified as higher risk, in line with Cabinet Office guidance, including PPN 009/25 (Procurement Act 2023 (PA23)), the Provider Selection Regime (PSR) and PPN 02/23 for contracts awarded under the Public Contracts Regulations 2015.
- Requires suppliers to comply with the UK Modern Slavery Act 2015, and to demonstrate appropriate policies and controls in relation to any goods or services supplied.
- Promotes longer-term supplier relationships, when permissible under public procurement regulations, to support transparency and continuous improvement in ethical practices.

6. Training and awareness

The Trust provides training and guidance to staff to support awareness and identification of modern slavery risks.

All staff are required to complete safeguarding training appropriate to their role, which includes information on recognising and responding to potential modern slavery and human trafficking.

Relevant staff involved in procurement and contract management are expected to uphold professional standards, including adherence to ethical procurement principles.

7. Monitoring and effectiveness

The Trust maintains oversight of the effectiveness of its measures to prevent modern slavery through:

- Procurement and contract management processes
- Safeguarding reporting and escalation arrangements
- Supplier assurance and national procurement mechanisms

Where concerns relating to modern slavery are identified, appropriate action is taken, including safeguarding interventions and referral to external agencies where required.

8. Approval

This statement has been approved by the Audit and Risk Committee on 18 June 2026 on behalf of the Board of Directors and will be reviewed and updated annually.