

Modern Slavery Act Annual Statement 2025 / 2026

Introduction

Modern slavery 'refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power'. Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

Imperial College Healthcare NHS Trust (hereafter referred to as the Trust) is 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 system and controls.

The Trust is committed to ensuring all 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.

The Trust has a zero tolerance for slavery and human trafficking and these concerns will be acted upon in accordance with related Trust Policies and Procedures.

Section 54 of the Modern Slavery Act 2015 requires all organisations to set out the steps the Trust 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.

Organisational Structure

Imperial College Healthcare NHS Trust provides acute and specialist healthcare for over one million people every year. The Trust serves local communities in eight boroughs that form the North West London Integrated Care System. The Trust is one of the largest trusts in the country with more than 16,000 members of staff working across five hospitals (Charing Cross, Hammersmith, Queen Charlotte's & Chelsea, St Mary's and The Western Eye).

More information about what the Trust does can be found on our [website](#).

Organisational Policies

The Trust fully supports the Government's objectives to eradicate modern slavery and human trafficking and recognises the significant role the NHS has to play in both combatting and supporting victims, whilst also ensuring responsibility towards patients, service users, employees and the local communities we serve.

The Trust has internal policies and procedures in place that assess supplier risk in relation to the potential for modern slavery or human trafficking. Suppliers affirm their own compliance with the modern slavery and human trafficking act within their own organisation.

The policies in place to support this are: Safeguarding Adults, Safeguarding Children and Safeguarding Training and Supervision, recruitment and selection and contract management.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking. Staff are expected to report concerns about slavery and human trafficking and these concerns will be acted upon in accordance with related trust policies and procedures.

Due Diligence

The Trust expects its suppliers to adhere to our principles and this includes being strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

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 on directly employed staff, and agencies on approved frameworks, auditing this to provide assurance that pre-employment clearance has been obtained for agency staff;
- Provides employees with access to disclose confidentially, including via safeguarding leads, freedom to speak up guardians and employee assistance programme;
- Purchases 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;
- Purchases a significant number of products through the NHS Supply Chain, whose 'Supplier Code of Conduct' includes a provision around forced labour; and
- Where possible builds long standing relationships with suppliers.

Assessing and Managing Risk

NHS Supply Chain's impact is global and its modern slavery and labour standards approach is therefore very important which is reflected in its due diligence when appointing suppliers.

The Trust accesses suppliers services via procurement frameworks which appoint, with proper due diligence, reputable and reliable firms, ensuring pricing reflects appropriate employment conditions.

Training

Advice and training about modern slavery and human trafficking is available to all staff through the Trust's safeguarding training.

All employees are required to complete mandatory Safeguarding Adults and Children training programmes, Levels 1 – 5 dependent on their role within the Trust.

Members of the senior Procurement Team are Chartered Institute of Purchasing and Supply (CIPS) qualified and adhere to the CIPS Code of Conduct which includes undertaking ethical training relating to modern slavery and human trafficking.

Monitoring and Evaluation

A suite of key performance indicators have been identified and will be monitored via contract management meetings including an indicator for modern slavery abuses.

Should modern slavery be identified, immediate support and help will be provided with necessary referrals being made to external partners as appropriate.

Approval

This statement has been approved by the Audit Committee by delegated authority from the Trust Board and the committee will review, update and approve this on an annual basis.