

King's College Hospital NHS Foundation Trust Group Modern Slavery Statement

Financial Year Ending 31 March 2025

1. Introduction

The King's College Hospital NHS Foundation Trust ("KCH") group ("KCH Group"), that includes KCH Interventional Facilities Management LLP ("KFM"), maintain an unwavering commitment to protecting human rights and eradicating all forms of modern slavery and human trafficking. We uphold a zero-tolerance approach to slavery and servitude within our business and supply chains. This statement is made in accordance with Section 54, Part 6 of the Modern Slavery Act 2015 and integrates insights from the latest statutory guidance, including Public Procurement Notice (PPN) 009: "Tackling modern slavery in government supply chains and NHS England's guidance "Tackling modern slavery in NHS procurement".

2. Organisational Structure and Supply Chains

KFM, a wholly owned subsidiary of KCH, delivers a wide range of healthcare support services through a workforce of over 320 staff. These services span clinical supply management, decontamination, sterile services, IT systems, outpatient pharmacy, renal support, and comprehensive procurement and contract oversight. In 2024–25, supplier expenditure exceeded £100 million across more than 5,000 primarily UK-based first-tier suppliers.

KFM manages procurement services on behalf of KCH, with over £500m expenditure on suppliers of good and services in the year ending March 2025, and also supports private healthcare partners domestically and internationally, in alignment with UK public sector procurement expectations.

3. Policies and Governance

The KCH Group's commitment to ethical procurement is embedded in a suite of policies reviewed regularly for compliance with legal and regulatory standards, including:

- Modern Slavery Policy
- Supplier Code of Conduct
- Code of Conduct for Employees
- Recruitment and Selection Policy
- Whistleblowing ("Raising Concerns") Policy
- Dignity at Work and Equality, Diversity & Inclusion Policies

All KCH Group procurement staff must adhere to the professional code of ethics and are trained in ethical sourcing practices.

4. Procurement and Due Diligence

The KCH Group integrates modern slavery considerations into all procurement activities. Our updated templates, including model contract forms, Procurement Specific Questionnaires (PSQs), Invitation to Tender (ITT) documents, and contract terms, explicitly require supplier compliance with the Modern Slavery Act.

Consistent with PPN 009: Tackling modern slavery in government supply chains and NHS guidance, KFM:

- Identifies and assesses modern slavery risks as part of procurement design, selection criteria and award criteria, with a focus on higher-risk categories and geographies.
- Builds appropriate contractual controls, including obligations to cascade standards through the supply chain, provide information on request and cooperate with audits and remediation.
- Manages risk through the contract lifecycle, including contract management plans, performance reviews and targeted assurance activity for higher-risk suppliers (for example in labour-intensive services or global consumables).

5. Risk Assessment and Management

The KCH Group applies a structured, risk-based approach throughout the procurement lifecycle:

- Pre-Contract: Modern slavery risks are assessed at market engagement and shortlisting stages
- Award Stage: Supplier obligations are contractually reinforced
- Post-Award Monitoring: Ongoing checks are conducted via SRM systems and third-party audits

No confirmed incidents of modern slavery were identified in the reporting year. Any breach would be treated as a material non-compliance and, as an ultimate recourse, possible grounds for contract termination.

5.1 Reporting Concerns

Concerns may be raised confidentially with line managers or the KFM Governance team. Strategic supplier concerns are escalated to the Cabinet Office in line with government protocols.

5.2 Recruitment Safeguards

All new hires are required to present valid right-to-work documentation and receive direct salary payments to bank accounts in their own name. These steps guard against forced labour and identity fraud.

6. Key Performance Indicators

Within the KCH Group, the following KFM KPIs are reviewed annually and benchmarked to ensure continued alignment with statutory requirements and sector best practice:

- Staff Training Compliance: Percentage of staff with up-to-date safeguarding training (target >95%).
- Supplier Statement Coverage: Percentage of in-scope supplier spend where suppliers have a compliant modern slavery statement.
- Training Completion Rates: Percentage of Procurement, Contracts, Finance, and Business Development staff who have completed mandatory modern slavery training.
- New Starter Induction: Percentage of new Procurement, Contracts, Finance, and Business Development staff who complete the training within six months of appointment.

Supplier segmentation and risk assessment tools are also used to proactively identify and monitor higher-risk relationships across the supply chain.

6.1 Monitoring and Auditing

To strengthen assurance on our key suppliers, KFM reviewed the top 250 KCH suppliers by spend in September 2025 and identified those that appeared to be in scope of Section 54 of the Modern Slavery Act but did not have a published transparency statement. Between September and November 2025, we wrote directly to every such supplier, setting out our concerns, reminding them of their legal obligations, and asking them either to publish a statement or to explain why they were out of scope.

This targeted engagement has had a measurable impact. Among in-scope suppliers, the proportion with a modern slavery statement has risen from 76.3% to 79.6%. More significantly, looking only at suppliers who have a statement, 62.2% are now in date compared with 23.4% previously.

This is a positive result not only for KFM and KCH, in terms of improved compliance in our own supply base, but also for our suppliers, many of whom have updated or published statements for the first time as a direct result of our outreach. In doing so, KFM has helped to raise awareness of modern slavery obligations more widely across the market, consistent with our role as a responsible NHS commercial partner.

Modern slavery statement coverage – top suppliers

KPI	FY 2023/24 baseline*	Sep 2025 review	Nov 2025 review
Suppliers in scope of the Modern Slavery Act (as % of top suppliers)	82.4%	83.5%	83.1%
In-scope suppliers with any modern slavery statement	80.0%	76.3%	79.6%
In-scope suppliers with an in-date statement	63.0%	23.4%	62.2%

Training and awareness KPIs

KFM monitors a small set of training indicators as a proxy for organisational awareness of modern slavery and safeguarding risks. Within KFM, at the close of the 2024/2025 financial year:

- 95.2% of staff had up-to-date safeguarding training
- 90.8% of staff working in procurement, contracts, finance, and business development had completed mandatory modern slavery training
- 93.4% of applicable new starters working in procurement, contracts, finance, and business development completed ethical procurement training within 6 months of commencing employment.

Performance for the last two financial years is shown below:

KPI	2023/24 (%)	2024/25 (%)	Change (percentage points)
Staff with up-to-date safeguarding training	96.8	95.2	-1.6
Procurement / contracts / finance / BD staff with modern slavery training completed	88.4	90.8	2.4
Applicable new starters in procurement / contracts / finance / BD completing ethical procurement training within 6 months	97.4	93.4	-4

Completion rates remain high overall. Modern slavery training coverage has improved year-on-year, while safeguarding and ethical procurement training have dipped slightly; actions are in place to recover coverage to $\geq 97\%$ in 2025/26.

In addition, KFM senior procurement staff have identified and contacted suppliers operating in high-risk sectors. These engagements are part of an ongoing initiative to promote cultural change and enhance modern slavery awareness among our supply chain partners. Moving forward, the KFM Commercial team will continue to categorise suppliers based on their modern slavery risk level, a process that will also be incorporated into the onboarding procedures for new suppliers.

6.2 Site Visit / Inspection

Within the KCH Group, and during the reporting period, KFM colleagues undertook a targeted site visit to a strategic supplier providing around 30 types of sterile procedure packs to KCH with annual expenditure just under £1m. The visit to the supplier's facility on 10 September 2025 had two purposes: (i) to obtain assurance on working conditions and employment practices for inclusion in the Trust's Modern Slavery Transparency Statement; and (ii) to explore opportunities around cost efficiency, sustainability and product development.

The facility was observed to be well-kept and orderly, with appropriate health and safety controls in place, clear evacuation information, and suitable rest and welfare areas for staff. The supplier reported that all staff are paid above the Living Wage, with healthy retention levels and access to employee benefits such as social events, grocery discounts and bonus schemes.

Oversight of overseas suppliers (notably in China and Pakistan) is supported by independent inspections, with plans for the Procurement & Sustainability Manager to conduct site visits. Overall, the visit provided strong assurance that modern slavery risks are being proactively managed in both UK operations and key overseas supply chains, with no material concerns identified.

7. Training and Awareness

All KFM and KCH staff receive mandatory safeguarding training. Procurement and Contract Management staff also complete advanced training on:

- Ethical sourcing
- Victim identification
- Modern slavery red flags
- Risk-based procurement under PPN 009

8. Continuous Improvement and Future Commitments

The KCH Group will continue to enhance its approach to identifying and addressing modern slavery by:

- Strengthening supply chain mapping and risk categorisation
- Expanding ESG and social value reporting in contracts
- Collaborating with NHS, Cabinet Office, and relevant bodies for sector-wide best practices
- Enhancing training content with survivor-informed materials and case studies

KCH takes responsibility for this Statement and its related objectives and will review and update it in accordance with The Act.

This Statement was approved by the KCH Board on 15 January 2026.