KFM Modern Slavery Statement

Financial Year Ending 31 March 2024

1. Introduction

KCH Interventional Facilities Management LLP ("KFM") maintains 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.

2. Organisational Structure and Supply Chains

KFM, a wholly owned subsidiary of King's College Hospital NHS Foundation Trust ("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 2023–24, supplier expenditure exceeded £105 million across more than 5,000 primarily UK-based first-tier suppliers.

KFM manages procurement services on behalf of KCH, with over £520m expenditure on suppliers of good and services in the year ending March 2024, and also supports private healthcare partners domestically and internationally, in alignment with UK public sector procurement expectations.

3. Policies and Governance

Our commitment to ethical procurement is embedded in a suite of policies reviewed regularly for compliance with legal and regulatory standards, including:

- Modern Slavery Policy (updated with a victim-centred and risk-based framework)
- 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
- KFM Values & Behaviours

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

4. Procurement and Due Diligence
5. Risk Assessment and Management

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

6.1 Key Performance Indicators (KPIs)

The following 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.

6.2 Monitoring and Auditing

Recognising the vastness of our supply chain, KFM partners with other bodies in the health sector and Central Government to supplement our monitoring capabilities, as it is not feasible to audit every second, third, or lower-tier supplier in detail.

A recent audit of our 250 largest suppliers, including both suppliers of KCH and KFM, found that 82.4% could be categorised as in scope, with 80% having a transparency statement published on their website, and 63% of those having revised their modern slavery statements within the previous 12 months.

We are committed to raising concerns with our supply chain where we are unable to trace contemporaneous statements, and this will form part of our monitoring this year.

Within KFM, at the close of the 2023/2024 financial year:

- 96.8% of staff had up-to-date safeguarding training;
- 88.4% of staff working in procurement, contracts, finance, and business development had completed mandatory modern slavery training;
- 97.4% of applicable new starters working in procurement, contracts, finance, and business development completed ethical procurement training within 6 months of commencing employment.

In addition, our 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, our 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.

7. Training and Awareness

All KFM 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

KFM 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

KFM takes responsibility for this Statement and its related objectives and will review and update it in accordance with The Act. Statement ratified by the KFM Management Board on 14/05/2025.



Preeya Bailie
KFM Managing Director
10th July 2025