

Modern Slavery And Human Trafficking Statement

May | 2022

Responsible Committee: Human Resources

Date Effective: May 2022

Author:

Supersedes: New policy

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Comments (details of change):

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 March 2022.

SELDOC ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational structure

SELDOC has business operations in the United Kingdom.

We operate in the Healthcare sector. The nature of our supply chains is as follows: We work with a number of product and service providers who support us in delivering services to patients. We source services such as agency labor and we source products such as medicines and PPE.

For more information about the Company, please visit our website: SELDOC.co.uk.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- **Recruitment and selection policy** - We complete full background checks on all staff as well as taking references. We also build an open and honest style of communication with all team members, creating an environment where people are able to speak openly and confidentially about any issues which are concerning them.
- **Supplier code of conduct** - We are clear with our suppliers that we expect them to do business in a completely ethical manner, which includes them providing us with the relevant assurances about the absence of modern slavery in their supply chains. We reserve the right to audit their business in order to validate these assurances.
- **Whistleblowing policy** - Our whistleblowing policy creates a safe-space for any member of staff, or anyone who comes into contact with our business, to whistle blow about a serious concern they may have. This is supported with a fully independent Freedom to Speak Up Guardian who can be contacted in complete confidence on any matter.

- **Procurement policy** - Among other things, our procurement policy contractualises our supplier code of conduct.
- **Safeguarding policy** - Our Safeguarding Policy encourages all members of staff, especially those who directly provide care, to flag any safeguarding concerns they may have. Our business processes are designed to ensure that these flagged concerns reach the appropriate audience in timely manner so that action can be taken where needed.

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Creating an annual risk profile for key suppliers.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because most of our supplier base involves the provision of professional services where workers are UK based. Some of our supplies are manufactured in other jurisdictions. This is a relatively small part of our supplier base.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 6 months.
- We will train our staff about modern slavery issues and increase awareness within the Company.

Training our staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.

Next steps

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by:

- Complete refreshed risk assessment across all suppliers. Implement a structured audit regime.

The statement was approved by the board of directors.

Steven Pink, Director
SELDOC

Date: May 2022