



Modern slavery statement

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1. Introduction

- 1.1. The term “modern slavery” refers to the offences related to human trafficking and slavery. This can then be classified within 5 subcategories :
 - 1.1.1. The sexual exploitation of adults
 - 1.1.2. The trafficking of adults into conditions of labour exploitation
 - 1.1.3. The trafficking of adults into conditions of criminal exploitation
 - 1.1.4. The trafficking of minors into conditions of sexual, criminal or labour exploitation
 - 1.1.5. Other forms of exploitation
- 1.2. Human trafficking involves the recruitment, transfer or acquisition of a person(s) through abduction, coercion, fraud/force, all with the intention to exploit them for personal gain.
- 1.3. Although human trafficking often involves an international element, it is also possible to be a victim of modern slavery within the UK. There are several categories of exploitation linked to human trafficking/modern slavery including forced labour, sexual exploitation, domestic servitude, organ harvesting, forced marriage and illegal adoption.
- 1.4. Modern slavery includes both victims who have been brought from overseas and vulnerable people in the UK who are forced to work or perform actions against their will.
- 1.5. This statement sets out the organisation’s approach to understand all potential modern slavery and trafficking risks which could potentially apply to any of the business’ process and to put in place mitigating controls to ensure the elimination of these risks.
- 1.6. The organisation is completely committed to preventing slavery and human trafficking in its operational activities, and to ensure that our supply chains are ethically conducted free from slavery and human trafficking.

2. Applicable regulatory references

- 2.1. Section 54 of the Modern slavery act 2015.
 - 2.1.1. <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
- 2.2. Implementing the UN Guiding Principles on Business and Human Rights
 - 2.2.1. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522805/Good_Business_Implementing_the_UN_Guiding_Principles_on_Business_and_Human_Rights_updated_May_2016.pdf

3. Objective

- 3.1. The purpose of this document is outline the steps taken by Med Logistics Health Services Limited (hereafter referred to as “the organisation” or simply “We”) to prevent modern slavery and human trafficking throughout our business and supply chains.

4. Scope

- 4.1. This policy applies to all facets of business conducted within the organisation; in particular to the supply chain process.
- 4.2. This policy must be read and understood by all staff. A copy will also be provided to the general public via the <https://medicallogistics.co.uk> website.

5. Organisation structure and supply chains

- 5.1. The organisation is a provider of healthcare industry services; from logistical services to point of care testing. The organisation has its headquarters in Mayfair, London, employing a workforce of more than 70 employees across the UK.
- 5.2. Our policies and procedures are designed to ensure that ethical behaviour forms the foundation of our operations. We ensure all staff are trained in safeguarding, modern slavery and human trafficking. We will continue to improve both our audit and training programmes to update all relevant policies/training plans to include appropriate references to the risk of modern slavery.
- 5.3. We operate a “Good Governance” structure to protect staff and clients’ personal information, and to ensure that our systems and services are not used to perpetrate or facilitate criminal activity.
- 5.4. The organisation uses a wide range of suppliers to conduct its business, with the majority of these being from within the UK. They supply a plethora of services and goods to ensure that we can continue to deliver our services to our clients.
- 5.5. The organisation recognises the importance of its role in implementing the safeguards proposed by the Modern Slavery Act 2015. Those involved in procurement are aware of the risk of modern slavery specifically and the effect it has on their procurement strategy.
- 5.6. An ethical procurement and tendering process will be developed in the coming year which will be used to draw the attention of our personnel to the risk relating to modern slavery, ensuring that they have access to the necessary information to recognise any signs and delineate how they can report any concerns/issues they have.

6. Policies in relation to slavery and human trafficking

- 6.1. The following policies relate to slavery and human trafficking, these are all reviewed on an annual basis by the Quality Management Team and the Board of Directors:
 - 6.1.1. MLMI-GEN-010-POL_Good Governance and monitoring policy
 - 6.1.2. MLCI-HAS-001-POL_Safeguarding Adults & Children
 - 6.1.2.1. Subsection 3.15- Modern Slavery safeguards
 - 6.1.3. MLMI-GEN-001-POL_Code of Conduct & Agreement
 - 6.1.4. MLMI-HRE-005-POL_Equality and Diversity Policy
 - 6.1.5. MLMP-HRE-002-PRD_Staff Recruitment Policy and Procedure
 - 6.1.6. MLMI-GEN-014-POL_Staff Whistleblowing

- 6.2. Through these policies and the measures below we aim to prevent modern slavery occurring within the organisation or within our supply chains:
- 6.2.1. All staff have undertaken mandatory training in safeguarding which covers modern slavery.
 - 6.2.2. Staff are aware of how to report incidents of concern and are encouraged to do so. They can do this through their line managers or through the steps outlined within our whistleblowing procedure.
 - 6.2.3. Safeguarding incidents are reported to the Quality Manager/Registered Manager.
 - 6.2.4. An appropriate procurement process is in place to ensure suppliers are harmonised with our policies and procedures.
 - 6.2.5. Pre-employment checks are performed by Human Resources to minimise the risk of modern slavery within our own recruitment process.

7. Due diligence processes

- 7.1. We undertake a due diligence approach when considering new suppliers, and regularly review existing suppliers. We aim to incorporate the following into our due diligence methodology:
- 7.1.1. Mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking.
 - 7.1.2. Using the [Walk-free foundation's business and investor toolkit](#).
 - 7.1.3. Utilising the ethical trading initiative's [base code guidance](#) and [guide to buying responsibly](#).
 - 7.1.4. Implementing responsible recruitment as per the [guidelines](#) set out by the Institute for Human Rights and Business.
 - 7.1.5. Engaging with the due diligence [guidelines](#) established by the Corporate Justice Coalition.
 - 7.1.6. Evaluating the modern slavery and human trafficking risks of each new supplier.
 - 7.1.7. Conducting supplier audits or assessments through our own staff.
 - 7.1.8. Using an ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, modern slavery and human trafficking.
 - 7.1.9. Invoking sanctions against suppliers which fail to improve their performance in line with compliance objectives, or for those who seriously violate our supplier code of conduct.

8. Risk assessment and management

- 8.1. The main risk associated with suppliers will remain an ambiguous or non-compliant supply chain, the mitigating controls will therefore focus on an elucidation of 3rd party unethical processes.
- 8.2. The above risk is managed through the following methods:
- 8.2.1. Using a vetted suppliers list of organisations which demonstrate compliance with the Modern Slavery Act.
 - 8.2.2. Engaging in supplier audits to determine compliance through their QMS.

8.2.2.1. This will include auditing their training programme, their contracts with their 3rd party suppliers, their modern slavery statement/report etc.

9. Key performance indicators (KPIs)


- 9.1. At the time of producing this statement no KPIs had been evaluated or set out (as this is a relatively new remit for an organisation still in it's infancy). We will, however, endeavour to monitor and generate the following KPIs to include within our next modern slavery statement:
- 9.1.1. Percentage of staff training: E-learning,
 - 9.1.2. Percentage of staff training: Practical,
 - 9.1.3. Number of onboarded suppliers,
 - 9.1.4. Number of audits performed,
 - 9.1.4.1. Percentage non-compliance/non-conformities,
 - 9.1.5. Amount of monies spent towards each supplier,
 - 9.1.6. Percentage of suppliers registered in the UK and abroad,
 - 9.1.7. Ratio of traceable to non-traceable supply chains,
 - 9.1.8. Number of recruitment checks both initial and ongoing.

10. Training on modern slavery and trafficking

- 10.1. Training will comprise of a combination of E-learning and practical seminars.
- 10.2. The practical seminars will be conducted in-house and consist of the following:
- 10.2.1. The organisation's purchasing practices and the tools used for due diligence,
 - 10.2.2. How to risk assess external organisations' QMS and implementation of slavery and human trafficking safeguards,
 - 10.2.3. Reporting of non-compliances within company and externally,
 - 10.2.4. Escalation of reporting of non-compliances (whistleblowing)
 - 10.2.5. How to proceed if suppliers do not implement anti-slavery systems in high-risk scenarios including, but not limited to, their removal from our supply chains.

11. Approval and publication

- 11.1. This statement has been approved by the organisation's Board of Directors, in accordance with the requirements of section 54(1) of the Modern Slavery Act 2015.
- 11.2. The approval of this document was agreed upon by the Directorate on the 22nd of April 2022 with an annual review set for the 22nd of April 2023.

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