

# COMPANY POLICIES & PROCEDURES No. 41

# **Modern Slavery Policy**

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## 1. Policy Statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, forced labour and human trafficking, all of which have in common the deprivation of a person's freedom by another in order to exploit them for personal or commercial gains.
- 1.2 DMR Collation falls below the Modern Slavery Act turnover threshold; however, we recognise that there will be significant expectations when working alongside larger firms as part of their supply chain.
- 1.3 DMR Collation has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in its business dealings and relationships by carrying out due diligence to ensure modern slavery is not taking place within its own business operations or that of its suppliers.

## 2. Due Diligence Processes

- 2.1 DMR Collation is committed to ensuring there is transparency in its own business to tackling modern slavery; we regularly review our salary grades and associated working hours to ensure that we adhere to the UK living wage / national minimum wage requirements, minimum labour standards and safe working conditions for all our employees. We utilise preemployment checks and do not operate a global workforce.
- 2.2 DMR Collation expects the same high standards from its suppliers, contractors, and other business partners. Therefore, as part of its procurement process it asks suppliers on a regular basis to complete a Supplier Questionnaire which gives evidence of their approach and policies related to a number of areas enforced by the Modern Slavery Act.
- 2.3 DMR Collation has codes of conduct in place for its suppliers as detailed in our Outsourced Activities Policy.

#### 3. Policy Purpose

3.1 The purpose of this policy is to set out how DMR Collation adheres to its obligations under the Modern Slavery Act 2015.

#### 4. Scope

4.1 This policy applies to all persons working for DMR Collation or on its behalf in any capacity including employees at all levels, directors, contractors, external consultants (nurse analysts) and suppliers forming part of their supply chain.

## 5. Responsibilities

- 5.1 The Managing Director has overall responsibility for ensuring effective implementation of this policy.
- 5.2 Day to day responsibility is delegated to the Office Manager.

#### 6. Training

DMR Collation has provided awareness to its staff so that they understand the signs of modern slavery and what to do if they suspect it is taking place; and has policies in place regarding ethical standards which all employees are provided guidance to during their induction to the Company.

## 7. Breaches of this Policy

- 7.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal or gross misconduct.
- 7.2 The Company may terminate its relationship with any contractors, suppliers or external consultants working on its behalf if they breach this policy.

#### 8. Related Documents

- 8.1 This Policy should be read in conjunction with the:
  - 7.1.1 Supplier Questionnaire.
  - 7.1.2 Outsourced Activities Policy.
  - 7.1.3 Personnel Handbook.
  - 7.1.4 Corporate Social Responsibility Policy.
- 8.2 A copy of this policy is available for public view on our company website.