



Modern Slavery Policy

Clinical Area / Department	Human Resources	
Policy Title	Modern Slavery Policy	
Reference Number	SUL/HR039	
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Reviewed By (name and job role)	Natalie Landsown, Associate Director of Finance Hayley Lord, Associate Director of HR Sam Saunders, Supply Chain and Procurement Manager	
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Authorised By (committee)	CGRMC	
Policy Author and Job Role	Hayley Lord, Associate Director of HR	
Version		
Version	Date	Summary of Changes
1.0	May 2017	New Policy
2.0	March 2026	Rebranded to Sulis Hospital from Circle Bath, Reviewed and updated with Finance, Supply and HR contributions. Purpose and Scope Sections Added Dictation supplier updated to T-pro Contact details updated Reference changed from GHR024 to SUL.HR039 4.2 Reference to new supplier vetting code 4.3 added to reference new supplier code of conduct.



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I. INTRODUCTION

What is Modern Slavery?

1.1. The Modern Slavery Act 2015 (MSA) covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

1.2. This policy covers all four activities

1.3. This policy is intended to support compliance with the Modern Slavery Act 2015 and related statutory guidance, and to set out our approach to preventing modern slavery within our business and supply chain.

How is it relevant to us?

1.3. Sulis has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

1.4. Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.

1.5. With this in mind, we need to pay particularly close attention to:

- our supply chain
- any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
- cleaning and catering suppliers
- corporate hospitality

2 SCOPE

This policy applies to all colleagues working for or on behalf of Sulis Hospital, including permanent and temporary employees, bank staff, agency workers, contractors, consultants, volunteers and any other third parties engaged by the organisation. It also applies to all areas of our operations and supply chain, including the procurement of goods and services, recruitment practices, outsourced functions and supplier relationships. All individuals and organisations within this scope are expected to act in accordance with this policy and support Sulis Hospital's zero-tolerance approach to modern slavery and human trafficking.

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3 PURPOSE

The purpose of this policy is to set out Sulis Hospital’s commitment to preventing modern slavery and human trafficking in all aspects of its business and supply chain. It provides a framework for identifying, reporting and addressing risks, supports compliance with the Modern Slavery Act 2015, and makes clear the responsibilities of colleagues, managers and suppliers in upholding lawful, ethical and transparent working practices.

4 DUTIES AND RESPONSIBILITIES

Sulis, our managers, and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

Everyone must observe this policy and be aware that turning a blind eye is unacceptable.

4.1 Sulis responsibilities.

Sulis will:

- (a) maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- (b) be clear about our recruitment policy
- (c) check our supply chains
- (d) lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc. to ensure we know who is working for us
- (e) ensure we have in place an open and transparent grievance process for all staff
- (f) seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- (g) make a clear statement that we take our responsibilities to our employees seriously

4.2 Managers

Managers will:

- (a) listen and be approachable to colleagues
- (b) respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
- (c) remain alert to indicators of slavery
- (d) raise the awareness of our colleagues, by discussing issues and providing training to relevant groups of employees, so that everyone can spot the signs of trafficking and exploitation and know what to do
- (e) use their experience and professional judgement to gauge situations
- (f) complete online training via My Learning Cloud

4.3 Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- (a) keep your eyes and ears open. If you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure

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- (b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- (c) tell us if you think there is more we can do to prevent people from being exploited

5. THE RISKS

5.1 The principal areas of risk we currently face in relation to slavery and human trafficking include:

5.1.1 some categories of suppliers; and

5.1.2 some outsourced functions, as evaluated in the table below.

Category	Risk	Reason	Mitigation
Professional Services	Low	Professional services tend to be well paid and highly qualified hence low risk to Modern Slavery	All the professional services must be registered with a professional body accredited by the government
Bank staff	Low	Most bank staff are registered nurses, HCSW's or other highly trained staff.	All agencies used by Sulis will be asked to provide their statement and or policy on modern slavery.
Contract Services	Low	All contract services are pre-qualified by a questionnaire and contractual terms cover law and regulations.	Contract services are monitored on a constant basis.
Medical equipment	Low	Most medical equipment is manufactured in Europe or America and has stringent quality, regulation, and standards checks.	Production details are specified and checked before making any purchase of medical equipment.

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High value medical implant or prosthesis suppliers	Low	Most implants are manufactured in Europe or America and have stringent quality, regulation, and standards checks.	Production details are specified and checked before making any purchase of high value medical implants or prosthesis.
Reusable/sterilised instruments	Low	Most reusable instruments are manufactured in Europe or America and have stringent quality, regulation and standards checks.	Production details are specified and checked before making any purchase.
Single use instruments	Medium	Some of the cheaper single use instruments are made in Pakistan and traceability is not always clear.	We have no bulk agreements; these are purchased as and when required. Appropriate checks and terms and conditions are used.
Catering	Low	All catering supplies are procured through established companies who have appropriate policies and controls.	Production details are specified and checked before making any purchase.
Cleaning contractors	Medium	Cleaning is undertaken by employed and bank Housekeepers and are checked through HR	Confirmed that relevant quality & HR policies and procedures are in place compliant with law, including pre-employment checks.
Uniform suppliers	Medium	Uniform suppliers' source much of their garments from Asia and the Far East which could potentially raise issues. Although this is not a large spend and we use established companies, we shall seek clarification on preventative measures in place.	Suppliers are UK based and shared with RUH Bath. Questionnaire completed and confirmed that relevant quality and policies and procedures are in place.

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Outsourced Support Functions	Low	T-pro are the dictation provider for Sulis and is insourced in the UK.	Questionnaire completed and confirmed that relevant quality & HR policies and procedures are in place.
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5.2 Sulis has a documented process (Supplier Vetting Policy) for the sourcing and approval of third party suppliers. There is an Approved Supplier Register which lists all vetted third party suppliers to the business. The supplier vetting process is completed before appointment or on contract renewal (or earlier, if any concerns arise) and follows the same format as initial approval.

5.3 There is a Sulis Hospital Supplier Code of conduct which supply companies must agree to.

5.4 Sulis' approved suppliers are predominately based in the UK. Goods and services are sourced for the following business areas and requirements:

- 5.4.1 Clinical Operations;
- 5.4.2 Support Services;
- 5.4.3 IT services;
- 5.4.4 HR/Recruitment (Permanent / Temporary); and
- 5.4.5 Outsourced Services.

5.5 We manage modern slavery risk areas by promoting equality throughout the organisation beginning at the point of recruitment and by increasing supply chain accountability through our procedures set out in this policy.

6. OUR AUDIT PROCEDURES

- 6.1 We will make a clear annual statement on our website that we take our responsibilities to our employees, people working within our supply chain seriously.
- 6.2 We will thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.
- 6.3 We will tell the companies we do business with that we are not prepared to accept any form of exploitation.
- 6.4 All our supplier contracts contain a modern slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.
- 6.5 All previous contractual agreements in existence before the introduction of this policy have been thoroughly assessed and approved.

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6.6 All contracts and renewals go through Sulis pre-qualification, department / budget sign off, if relating to stock purchase, it goes to the Supply Chain and Procurement lead, then Finance Business Partner Signoff and contracts etc are processed through the outsourced Procurement function in accordance with SFIs / Latest Procurement Processes where applicable to ensure compliance.

7. RECRUITMENT

7.1 Agencies:

- 7.1.1 HR follows company policy and uses approved agencies for supply of temporary workers.
- 7.1.2 To ensure the potential for slavery and human trafficking is reduced as far as possible, before using any recruitment agencies for employed staff HR checks the agency has
 - (a) displayed their Modern Slavery Policy on their website
 - (b) investigates the agency's business reputation
 - (c) ensures that all staff employed through the agency have the appropriate paperwork (e.g. Right to work in the UK, visas, DBS etc);

7.2 General recruitment:

- 7.2.1 We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- 7.2.2 We always ensure staff are legally able to work in the UK.
- 7.2.3 We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to
- 7.3 If, through our recruitment process, we suspect someone is being exploited, HR will follow our reporting procedures as outlined in this policy.

8 IDENTIFYING SLAVERY

- 8.1 There is no typical victim, and some victims do not understand they have been exploited and are entitled to help and support.
- 8.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim.
 - The person is not in possession of their own passport, identification, or travel documents.

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- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn, or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.
- This list is not exhaustive.
- Remember, a person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person’s circumstances which may indicate something is not quite right.
- If you have a suspicion, report it.

9 REPORTING SLAVERY

- 9.1 Talking to someone about your concerns may stop someone else from being exploited or abused. We have in place a system to encourage the reporting of concerns and the protection of whistle blowers, which is known as “Stop the Line”.
- 9.2 Otherwise, you should discuss your concerns with Head of Procurement. Please see below for contact details:
- 9.3 Contact Procurement and Supply Chain Lead or Associate Director of HR,
 Email: purchasing@sulishospital.com or hr@sulishospital.com
 Telephone: 01761422318
- 9.4 A course of action will be decided and further advice given.
- 9.5 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with the Procurement before taking any further action.

10 TRAINING

- 10.1 We provide specialist training through my learning cloud to those staff members who are involved in management, managing recruitment and our supply chains.

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10.2 More general awareness training is provided to all staff through this policy.

11 MONITORING OUR PROCEDURES

We will review our Modern slavery policy regularly, as required. We will provide information and/or training on any changes we make.

12 LINKS TO OTHER POLICIES, STANDARDS (ASSOCIATED DOCUMENTS)

- Supplier Vetting Policy
- Supplier Code of Conduct
- Modern Slavery Act 2015 [Modern Slavery Act 2015 - GOV.UK](#)
- The Procurement Act 2023 [The Procurement Act 2023: A short guide for suppliers \(HTML\) - GOV.UK](#)

13 STAKEHOLDER ENGAGEMENT

	Name	Title	Signature	Date
1.	Natalie Landsdown	Associate Director of Finance		May 2026
2.	Sam Saunders	Supply Chain and Procurement Manager		May 2026
3.				

14 DISSEMINATION, STORAGE AND ARCHIVING (CONTROL)

Version	Date uploaded to intranet	Any other promotion or dissemination, include date
2.0	23/6/2026	Published to website.

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APPENDIX I: EQUALITY IMPACT ASSESSMENT

Equality Impact Assessment Tool		Yes/ No	Comments
1.	Does the policy affect one group less or more favorably than another on the basis of:		
	• Race	No	
	• Ethnic origins (including gypsies and travelers)	No	
	• Nationality	No	
	• Gender	No	
	• Culture	No	
	• Religion or belief	No	
	• Sexual orientation including lesbian, gay and bisexual people	No	
	• Age	No	
	• Disability - learning disabilities, physical disability, sensory impairment, and mental health problems	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	N/A	
4.	Is the impact of the policy/guidance likely to be negative?	N/A	
5.	If so, can the impact be avoided?	N/A	
6.	What alternatives are there to achieving the policy/guidance without the impact?	N/A	
7.	Can we reduce the impact by taking different action?	N/A	

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APPENDIX 2: SCORING CRITERIA – MSA QUESTIONNAIRE

Pass/Fail Scoring			
No = Mandatory Fail			
Yes + Unsatisfactory explanation = Discretionary Fail			
Yes + Satisfactory explanation = Pass			
Question		Contents	Score Criteria
1	1.1-1.3	Company Information	Not scored
2	2.1	Do you have a programme to ensure human trafficking and slavery do not exist in your operations and supply chain?	P / F
	2.2	Have you identified the overall risks of slavery and human trafficking in your supply chain e.g. by mapping your supply chain and/or by analysing the countries you source from?	P / F
	2.3	Do you conduct audits of your operations and suppliers?	P / F
	2.4	If supplying goods, do you require your direct suppliers to certify that all materials incorporated into your final product were sourced, processed and manufactured in compliance with the human trafficking and slavery laws of the country or countries in which they operate?	P/F (If applicable)
	2.5	Do you have company standards on human trafficking and slavery for your employees and contractors, with effective sanctions for non-compliance?	P / F
	2.6	Have you trained relevant employees (e.g.. management and those in charge of your supply chain) on what slavery and	P / F
	2.7	Do you maintain appropriate health and safety procedures?	P / F
	2.8	Do you have adequate grievance procedures which your staff are free to use?	P / F

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APPENDIX 3: SUPPLIER QUESTIONNAIRE

1.1	Company Information:		
1.1.1	Company Name	[Insert]	
1.1.2	Vendor/Reference Number	[Insert]	
1.1.3	Your Name	[Insert]	
1.1.4	Your Position	[Insert]	
1.1.5	Telephone Number	[Insert]	
1.1.6	Email Address	[Insert]	
1.2	Site/Location		
1.2.1	Geographical location of your main employment site	[Insert]	
1.2.2	Management structure description	[Insert]	
1.3	Staffing		
1.3.1	Total number	[Insert]	
1.3.2	Gender split	[Insert]	
1.3.3	Nationalities (including approx %)	[Insert]	
1.3.4	Languages spoken	[Insert]	
1.3.5	Is accommodation offered to staff? If yes, please provide details	Yes/No	
1.3.6	Forms and rate of payment	[Insert]	
Procedures to prevent slavery and human trafficking			
2	Question	Yes/No	Description/Explanation
2.1	Do you have a programme to ensure human trafficking and slavery do not exist in your operations and supply chain?		
2.2	Have you identified the overall risks of slavery and human trafficking in your supply chain eg. by mapping your supply chain and/or by analysing the countries you source from?		
2.3	Do you conduct audits of your operations and suppliers?		
2.4	If supplying goods, do you require your direct suppliers to certify that all materials incorporated into your final product were sourced, processed and manufactured in compliance with the human trafficking and slavery laws of the country or countries in which they operate?		
2.5	Do you have company standards on human trafficking and slavery for your employees and contractors, with effective sanctions for non-compliance?		
2.6	Have you trained relevant employees (eg. management and those in charge of your supply chain) on what slavery and human trafficking are and how to mitigate the risk of them in their roles?		
2.7	Do you maintain appropriate health and safety procedures?		
2.8	Do you have adequate grievance procedures which your staff are free to use?		

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