

SAH Diagnostics Modern Slavery and Human Trafficking Statement

Document	Modern Slavery and Human Trafficking Statement
Reference Document	
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Author	SAH Legal with HR Consultants
Owner	HR Department
Target audience	All SAH Diagnostics Employees
Related policies	Check other HR Policies and Documents



Modern Slavery and Human Trafficking Statement

1. Introduction

- 1.1. SAH Diagnostics is committed to preventing modern slavery and human trafficking in all aspects of our operations and supply chains.
- While we do not meet the turnover threshold requiring mandatory compliance under Section 54 of the Modern Slavery Act 2015, we voluntarily produce this statement to affirm our dedication to ethical business practices and human rights.
- 1.3. We take a zero-tolerance approach to any form of modern slavery and work proactively to ensure that slavery and human trafficking are not present in our organisation or supply chains.

2. Organisation Structure, Business, and Supply Chains

- 2.1. SAH Diagnostics is a UK-based healthcare provider delivering diagnostic and treatment services to NHS Trusts and private healthcare organisations.
- 2.2. Our supply chain includes:
 - Medical equipment suppliers, including ultrasound scanners and consumables.
 - Maintenance and servicing contractors for medical devices.
 - Healthcare professionals, including Consultants, Radiographers, Sonographers, Nurses, Advanced Practitioner Nurses, Healthcare Assistants, etc.
 - Administrative and IT service providers that support our operations.
 - We work with suppliers and service providers primarily within the UK, ensuring compliance with local labour laws and regulations.

3. Policies in Relation to Modern Slavery and Human Trafficking

- 3.1. SAH Diagnostics has implemented an Anti-Slavery and Human Trafficking Policy, which outlines our commitment to ethical business practices and fair treatment of all workers.
- 3.2. Key components include:
 - A zero-tolerance approach to modern slavery in any form.
 - The expectation that all **employees**, **suppliers**, **and contractors** adhere to anti-slavery principles.
 - A **whistleblowing policy** to encourage reporting of any concerns related to slavery or human trafficking.
 - A commitment to **fair recruitment practices**, ensuring that employees are not subjected to coercion, exploitation, or bonded labour.



4. Due Diligence Processes

- 4.1. To prevent slavery and human trafficking in our business and supply chains, we have established the following due diligence measures:
 - **Supplier Vetting:** We conduct **pre-contractual assessments** of new suppliers to verify their adherence to ethical labour practices.
 - **Contractual Safeguards:** Our contracts include anti-slavery clauses, requiring suppliers to comply with the Modern Slavery Act 2015 and permitting audits to ensure compliance.
 - **Monitoring and Audits:** We conduct regular supplier reviews to identify and mitigate any risks of forced or exploitative labour.
 - Employee Verification: We ensure that all employees, including those on Skilled Worker Visas, are recruited through fair and transparent processes.

5. Risk Assessment and Management

- 5.1. assesses areas within our business and supply chains where modern slavery risks may be present, including:
 - Medical Equipment Supply Chains: We engage only with trusted suppliers who meet NHS and CQC standards.
 - Third-Party Contractors: Although we do not routinely use external contractors, any contractors we engage (e.g., for medical equipment maintenance or additional sonographers) are subject to strict vetting and compliance checks.
 - Recruitment of Skilled Workers: We follow a three-phased assessment process to ensure that all healthcare professionals meet safety and competency standards before starting patient-facing roles.
 - International Supply Chains: Where applicable, we ensure that any overseas suppliers adhere to ethical sourcing and labour standards.

6. Measuring Effectiveness

- 6.1. We measure the effectiveness of our efforts to prevent modern slavery using the following performance indicators:
 - Training Compliance: Monitoring completion rates of mandatory modern slavery awareness training for all staff.
 - Supplier Audits: Reviewing supplier compliance with contractual anti-slavery obligations and addressing any breaches.
 - Incident Reporting: Tracking and investigating any reported concerns related to modern slavery, ensuring appropriate action is taken.



• Policy Reviews: Conducting annual reviews of our modern slavery policies and processes to enhance effectiveness.

7. Training and Capacity Building

- 7.1. To raise awareness and build capacity within our organisation, we provide:
 - Mandatory training for all employees on modern slavery risks, detection, and reporting procedures.
 - Targeted training for procurement and HR teams to identify risks in recruitment and supplier relationships.
 - Continuous learning resources to keep staff updated on best practices in ethical employment and supply chain management.

8. Commitment to Continuous Improvement

- 8.1. SAH Diagnostics remains committed to strengthening our approach to preventing modern slavery and human trafficking.
- 8.2. We will continue to refine our policies, training, and supplier engagement to uphold the highest ethical standards in healthcare.

This **Modern Slavery and Human Trafficking Statement** is made pursuant to **Section 54(1) of the Modern Slavery Act 2015** and will be reviewed and updated annually.