

SWC Medical Group
Dr Alex Trompetas & Partners

SELSDON PARK
97 Addington Road
Selsdon
Surrey CR2 8LG

WARLINGHAM GREEN
1 Church Road
Warlingham
Surrey CR6 9NW

CHALDON ROAD
Chaldon Road
Caterham
CR3 5PG



Modern Slavery Policy

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that SWC Medical Group take to ensure that modern slavery or human trafficking is not taking place within our business and supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. SWC Medical Group 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 the business and supply chain.

Steps for Preventing Modern Slavery

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains.

Our Business

SWC Medical Group consists of Selsdon Park Medical Practice, Warlingham Green Medical Practice and Chaldon Road Surgery. Our primary business is to provide General Medical Services. We deal with many different organisations in our supply chain which is mainly attained through the NHS, as well as employing around 70 people directly.

Reporting Modern Slavery or Human Trafficking

Combating modern slavery: Suspicious Activity Confidential Feedback Line - 0870 600 6400.

This line may be accessed by employees or any other person wishing to raise a concern. You should call this line in any of the following circumstances:-

- You suspect a person acting on behalf of SWC Medical Group or one of our businesses is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of SWC Medical Group or one of our businesses who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of SWC Medical Group or one of our businesses or suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015. Reports to the Suspicious Activity Confidential Feedback line (“the Line”) are kept in confidence, subject to the need for SWC Medical Group to act responsibly and within the law. The source of reports to the Line will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery being committed on our behalf or in any element of our supply chain.

Our Policies

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

Recruitment Policy

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Whistleblowing Policy

We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Safeguarding Adults and Children Policies

We operate robust safeguarding policies and train all staff to at least Level 1, Clinicians to Level 3.

Our Suppliers

SWC Medical Group maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery.

Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We regularly conduct training for our staff to ensure that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

N:/Policies/Modern Slavery Policy 2016

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