

Company Name:	Holt Doctors Limited (“the Company”)
Policy Name:	Voluntary Modern Slavery Statement
Date adopted:	August 2016
Date of last review:	October 2019
Date of next review	October 2020
Version:	v.2

Voluntary statement

1. The Company is making a voluntary modern slavery and human trafficking statement relating to section 54 of the Modern Slavery Act 2015.
2. Our annual turnover is under £36 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act.2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains.
3. The Company opposes slavery and human trafficking in all its forms and make this statement to set out the steps we have taken to ensure that there is no slavery or human trafficking in our business or in our supply chains.

About us

4. We are a limited company providing recruitment services in the public and private healthcare sector.
5. Our supply chains are predominately made up of (a) sub-contractor recruitment agencies and businesses (b) IT services and infrastructure. Part (a) represents the part of our supply chain where the risk of modern slavery may be highest and where we have taken specific measures to mitigate the risk as described in this statement.

Our commitment to ethical trading

6. We are committed to ethical trading principles and to acquiring goods and services without harm to others. We are committed to ensuring that our employees and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.

Due diligence and risk assessment

7. We only employ agency workers through reputable employment agencies that adhere to our compliance policies.

Training and reporting

8. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all our staff, including our recruiters, HR personnel, and/or staff involved in our procurement and supply chains undertake internal training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.

9. All staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to our Operations Manager.
10. Reports surrounding these issues are taken extremely seriously by the Board and senior leadership team, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
 - Working with the appropriate organisations to improve standards;
 - Removing that organisation from our preferred supplier list;
 - Passing details to appropriate law enforcement bodies.

Effectiveness in combating slavery and human trafficking

11. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
 - The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements and related policies;
 - The percentage of workers and/or candidates supplied from our preferred supplier list;
 - The amount of time spent on audits, re-audits, spot checks, and related due diligence; and
 - The level of modern slavery training and awareness amongst our staff.
12. We would also recommend reading this in conjunction with our other policies, including our Anti-bribery / corruption policy and Whistle-blowing policy.

Adoption and review

This voluntary statement is made in connection with section 54(1) of the Modern Slavery Act 2015 and was adopted on **25th August 2016** after being agreed by the Company's board of directors. It is reviewed annually.