



Modern Slavery and Human Trafficking Statement 2018

Circle Health Holdings Limited

Circle Clinical Services Limited

Circle Nottingham Limited

1. Introduction

Circle Health Holdings Limited is the holding company for Circle Health Limited, a UK healthcare group (the “Circle”) operating hospitals and providing clinical services to NHS-funded, self-paying, and privately-insured patients.

Circle is committed to preventing acts of modern slavery and human trafficking within its business and supply chain, and requires that its suppliers are similarly committed. To this end, we undertake the following steps to ensure we comply with relevant UK legislation and to mitigate the risk of modern slavery and human trafficking occurring in our supply chain, including:

- conducting due diligence process of all our existing suppliers;
- complying with our Modern Slavery Policy (“MSP”) when setting out our audit, monitoring, and reporting processes; and
- incorporating the key elements of our MSP into contractual approach to engaging new suppliers.

2. Policies

As part of our commitment to combating modern slavery, we have adopted an MSP and a Whistleblowing Policy. As we work with a range of suppliers to provide high quality healthcare services to our patients, we also seek to ensure our suppliers are aware of our MSP and adhere to the same high standards that we do.

3. Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, Circle has a documented process for approving third-party suppliers. Circle requires suppliers to complete a questionnaire confirming their compliance with quality, environmental aspects, health and safety, information security, equal opportunities, recruitment standards, and other relevant aspects. A full supplier review process is completed before appointment or on contract renewal, and ad hoc reviews are undertaken if any concerns arise. Our Modern Slavery Questionnaire forms an additional part of the overall review process and, where it flags up any concerns, we investigate further before we decide whether to engage that supplier. For example, we undertook a vigorous physical site audit of one of our higher risk foreign service providers in 2018. We maintain an Approved Supplier Register that records all vetted third-party suppliers to the business.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistle-blowers.



4. Risk and compliance

Circle regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by annual reviews of existing and new business areas and any affected policies.

Overall, we consider the healthcare sector to be low risk for acts of slavery and human trafficking, apart from single-use surgical instruments, uniform suppliers and outsourced support functions, which are medium risk areas. All current suppliers have been thoroughly assessed and are marked low risk in the Approved Supplier Register.

We will continue to ensure all our suppliers adhere to our MSP. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. Where warranted, we will exercise our right to terminate our relationship with the supplier if we become aware that it has failed to comply with modern slavery legislation.

5. Effectiveness and KPIs

Circle uses key performance indicators (KPIs) annually to measure how successful we have been in ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains. These are as follows for 2018:

- number of known incidents of slavery and human trafficking linked to Circle either by its operations, business relationships or supply chain (currently nil);
- percentage and number of suppliers investigated on suspicion of human trafficking and slavery (nil);
- percentage and number of suppliers signed up to Circle MSP requirements (100%/290); and
- percentage of procurement and HR staff trained on the issue of human trafficking and slavery and the application of our MSP (100%).

An audit was carried out in 2018 on one of Circle's high risk suppliers whereby the location that the services are carried out was visited and reviewed. The outcome of this audit demonstrated that the supplier is compliant with Circle MSP requirements.

6. Training

Our employees are required to act in line with our policies (including MSP) that promote integrity and respect for each other. Our Circle Credo stresses that "everyone matters", irrespective of their job or background. Further training is provided to procurement and HR teams. It covers modern slavery and human trafficking and includes information on where the risks lie and how to minimise and prevent them. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

7. Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to continue reviewing KPIs annually and monitoring the robustness of the systems and controls we have in place.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Circle's slavery and human trafficking statement for the financial year commencing 1 January 2018 and ending 31 December 2018.

Signature: 

Director

Circle Health Holdings Limited

Date: 10 JULY 2019