

Modern Slavery & Human Trafficking Statement

Introduction

Whilst we are a small company, we are proud of the steps we are taking to help combat slavery and human trafficking and this statement details our policies and practices in recognising and preventing human trafficking and modern slavery within our business or supply chain.

The Company's understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015. This Slavery and Human Trafficking Statement constitutes Swallow Dental Supplies Ltd.'s ("Swallow Dental") slavery and human trafficking statement and policies.

About Us

Swallow is a supplier of specialist high quality dental products for dental implantology, periodontology, oral hygiene, and magnification in the UK. We have been proudly delivering our service to dental surgeons, hygienists and therapists for over 18 years and are based in Silsden, West Yorkshire.

Our supply chain includes procurement of surgical consumables and equipment. We have over 300 suppliers and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Approach

Modern slavery includes slavery, servitude, human trafficking and forced labour. We are committed to acting ethically, with integrity and transparency in all of our business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our supply chain.

Our working practices and Human Resource policies also commit Swallow Dental to providing a workplace that is free from discrimination, intimidation, hostility, and violence.

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 relevant staff. Our employees are encouraged to identify and report any potential breaches of our anti-slavery policy and we have in place protection for whistle blowers.

Our Suppliers

We adopt effective systems and controls to identify and minimise the risk of slavery and human trafficking taking place within our supply chains. We ensure as far as possible that we work with suppliers who treat their obligations towards modern slavery with the same importance that we do.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.

Swallow Dental has conducted a profiling of existing suppliers a process to identify potential risk areas. We conduct checks on new suppliers as part of our procurement process.

We conduct due diligence on all suppliers that represent greater than 1% of our total purchase spend. Due diligence includes an assessment of the location of the supplier and whether they are based in a jurisdiction that is high on a modern slavery index. An online search to assess that the supplier has its own policies on modern slavery is also conducted.



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Where a risk is deemed to exist, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations

Further Measures

Currently we are not aware of any forced labour or child Labour within our supply chain, but we are taking steps to identify, better understand and address any such potential risks.

In light of the Modern Slavery Act, we are assessing our interaction with suppliers and will review supplier responses to our questionnaires to continue to identify any areas of risk and concern.

In the event that a real or potential risk is identified, we will seek to engage with any affected suppliers to address and eliminate any critical issues

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.
- Our supplier evaluations identified no specific risks of any abuse of employment rights.
- None of our operations or suppliers were identified as at risk of incidents of slavery or forced or compulsory labour.

Approval For This Statement

This statement was approved by the Board of Directors on

Name (Director): Dr. P. Harrison

Signature: 

Date : 23-02-2017

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