



# Modern Slavery Policy

<b>Reference number:</b>	VRSD75
<b>Policy Approved by:</b>	Scott Elwell
<b>Date of Approval:</b>	23/04/2026
<b>Date Issued:</b>	24/04/2026
<b>Review Date:</b>	24/04/2027
<b>Document Owner (Author):</b>	Sue Daniels

The signing of this policy represents my commitment on behalf of the Company.

Signature of Chief Executive Officer:

**Arun Chauhan**

Date: 23/04/2026

### Version Control and Summary of Changes

<b>Version Number</b>	<b>Date</b>	<b>Comments (details of changes)</b>
1.1	29/04/24	Initial Creation
1.2	03/04/25	Checked for accuracy
1.3	23/03/26	Updated and added appendix 1
1.4	24/03/26	Updated further
1.5	23/04/26	Updated KPIs and Supply chain

This policy can be provided in large print or Braille if requested. This document is used by all services owned and operated by Vital Radiology Services Ltd.

## **1. Purpose and Commitment**

Vital Radiology Services (VRS) is committed to preventing modern slavery, servitude, forced or compulsory labour and human trafficking within its business and supply chains.

This policy is published in accordance with section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations.

VRS takes a zero-tolerance approach to any form of modern slavery and is committed to acting ethically, transparently and with integrity in all its business relationships. We aim to implement effective systems and controls to minimise the risk of modern slavery within our operations and supply chains and to respond appropriately should concerns arise.

### **1. Owners**

All VRS employees will be aware of and work within this policy. The Chief Technical Officer will take lead responsibility for deployment of this policy. The Governance Lead will send to all Vital Radiology Services' Suppliers and ask them to complete the declaration in Appendix 1.

### **2. Organisation Structure, Business and Supply Chains**

VRS is a UK-based provider of consultant-led teleradiology services, delivering diagnostic reporting services to NHS Trusts and other healthcare organisations across the United Kingdom.

Our core business activities include:

- remote reporting of diagnostic imaging by UK-registered Consultant Radiologists,
- clinical governance, audit and quality assurance activities,
- secure IT systems and workflow management in support of service delivery.

Vital's supply chains primarily relate to:

- clinical workforce engagement, including self-employed radiologists and contracted associates,
- information technology services and software providers,
- professional services, including audit, legal and regulatory support.

Vital does not operate in high-risk sectors for modern slavery and does not routinely engage suppliers operating in jurisdictions recognised as high risk. Nonetheless, we recognise that modern slavery can exist in all sectors and remain vigilant.

### **3. Policies Relating to Modern Slavery and Human Trafficking**

VRS's position on modern slavery is supported by the following policies and standards:

- Modern Slavery and Human Trafficking Policy (this document),
- Whistleblowing Policy,
- Recruitment and Selection Policies,
- Supplier Management and Due Diligence processes,
- Radiologist Performance and Governance Policies.

These policies collectively define expected behaviour, escalation routes and accountability mechanisms, and apply to all employees, contractors, associates and suppliers engaged by VRS.

#### **4. Due Diligence Processes**

VRS undertakes due diligence to mitigate the risk of modern slavery within its business and supply chains, including:

- Right-to-Work and identity checks for all radiologists and associates prior to engagement,
- Ethical recruitment practices and prohibition of recruitment fees paid directly or indirectly by workers,
- Supplier selection criteria that reflect compliance with modern slavery legislation,
- Annual supplier audits and declarations confirming adherence to modern slavery principles,
- Contractual expectations requiring suppliers to comply with applicable labour and employment laws.

Suppliers are required to complete an annual declaration of commitment to this policy, and concerns identified through due diligence are escalated to senior management for review and action.

We will strive to ensure that our services are delivered:

- Lawfully, through fair and honest dealing
- By providers and suppliers who employ adult workers who are properly paid and treated with respect
- In sites where there are decent working conditions
- Where any negative impact on the environment is minimised
- By suppliers who share our commitment in ensuring that modern slavery and human trafficking does not take place in any part of our business or supply chain.

We continue to mitigate the supply chain risk by strengthening our supply chain practices.

We will not support or engage suppliers where we are aware of slavery or human trafficking in either their business or supply chains.

#### **5. Risk Assessment and Management**

VRS undertakes a proportionate assessment of modern slavery risk across its operations and supply chains.

Based on the nature of our business and supply chain profile, the overall risk of modern slavery within VRS's direct operations is assessed as low. Potential risk areas may include:

- engagement of temporary or subcontracted personnel,
- third-party IT or professional service providers,
- supplier practices beyond the UK.

To manage these risks, VRS:

- applies due diligence and audit processes to suppliers,
- requires explicit supplier commitments to modern slavery compliance,
- maintains escalation routes for concerns raised by staff, associates or suppliers,
- will not engage or will terminate relationships with suppliers where credible modern slavery concerns are identified.

## **6. Measuring Effectiveness**

VRS monitors the effectiveness of its approach to modern slavery through:

- annual review of this policy,
- supplier audit and declaration completion rates,
- confirmation of training completion by staff and associates,
- review of any reported concerns through governance processes.

Any identified issues or trends are reviewed by senior management and inform updates to policies, training or supplier engagement processes. To date, no substantiated incidents of modern slavery have been identified within VRS's business or supply chains.

Effectiveness measures are reviewed annually by senior management and inform policy updates, supplier engagement decisions and training priorities.

## **7. Training and Awareness**

VRS provides training and awareness-raising on modern slavery to relevant staff and associates. Training includes:

- awareness of the indicators of modern slavery and human trafficking,
- responsibilities under the Modern Slavery Act 2015,
- how to raise concerns safely and confidentially.

Training is refreshed annually and updated where necessary to reflect emerging risks or legislative changes.

## **8. Reporting Concerns**

VRS encourages all employees, associates and suppliers to report concerns relating to modern slavery or human trafficking. Concerns can be raised through management channels or via the Whistleblowing Policy. All concerns will be taken seriously and investigated appropriately.

## **9. Governance and Review**

Responsibility for this policy sits with the Chief Executive Officer, supported by the Governance Lead and Chief Technical Officer. The policy is reviewed at least annually and approved through formal governance arrangements.

VRS provides training and awareness-raising

## Modern Slavery Policy v 1.5

Key tools we will use include:

1. Sourcing selection criteria that reflects this policy.
2. Completion of a “right to work check” as part of our Associate recruitment process
3. We provide training to staff and associates on how to identify signs of modern slavery, how to report concerns, and the responsibilities set out under the Modern Slavery Act 2015. This training is refreshed annually and updated to reflect emerging risks.
4. Review the policy and reinforce the principles to all Associates at least annually.
5. Alerting the CEO/Chief Technical Officer to any instances and concerns as soon as they are recognised.
6. Taking appropriate actions to address any instances and concerns raised. If an employee has a serious concern relating to the operation of the business, we have a Whistleblowing Policy in place that enable that person to confidentially raise their concerns.
7. Carry out annual Supplier Audits to identify that Suppliers have Modern Slavery Policies in place.

## **Review and Updates**

This policy will be reviewed every 12 months as a minimum.

**Appendix 1** - Annual declaration of commitment to Modern Slavery Policy

All suppliers are required to declare an understanding of Vital's Modern Slavery Policy and commit to adherence to the policy.

Declaration of commitment to Modern Slavery Policy

To: Dr Arun Chauhan, CEO, Vital Radiology Services

I hereby declare that:

- I have read and understood the Modern Slavery Policy of Vital Radiology Services
- I will work to ensure that I adhere to this policy, ethically and with integrity

Company Name:

Signature:

Name:

Role/position:

Date:

Please return your completed declaration via email to: [sue.daniels@vitalrad.co.uk](mailto:sue.daniels@vitalrad.co.uk)