Annual modern slavery statement

Document Control

This document is located within the Cloud21 SharePoint in the policies and procedures area and is held on the Cloud21 website and published within the government modern slavery statement registry.
The document will be reviewed annually and approved by the senior leadership team before publication within 6 months of the end of the financial year.

Document Classification

This document has been classified as external.

Revision History

Date	Version	Status	Author	Summary of Changes
01.05.2024	0.1	First draft	Chantelle Menzies-Beer ADO	New document
15.05.2024	0.2	Review	Chantelle Menzies-Beer ADO	Updated to reflect SLT feedback
15.05.2024	1.0	Final	Chantelle Menzies-Beer ADO	Approved

Approvals Record

This document requires the following approvals

Name/ Group	Date
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Key Dates

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Reference Documents

Document Name	Location	Version	Author
Annual Modern Slavery Statement	SharePoint	1.0	Chantelle Menzies-Beer ADO

Distribution List

Company	Name	Role	Approval Date
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Introduction

Cloud21 understands the serious issues represented by modern slavery and human trafficking. These crimes are a gross violation of fundamental human rights. Slavery and trafficking can take various forms, all of which have in common the deprivation of a person's liberty by another, in order to exploit them for personal or commercial gain.

Cloud21 is committed to acting ethically and with integrity in our dealings and relationships with others and to the fair and humane treatment of people in our business and in our supply chains. We have a zero-tolerance approach to these crimes, and we expect the same standard from all of our suppliers, contractors and our people.

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the steps that we have taken to prevent modern slavery and human trafficking within our business and supply chains for the year ended 31st December 2023.

Our business and organisation structure

Cloud21 is a digital healthcare and consulting services company delivering integrated solutions that help health and care organisations transform healthcare.

We employ our staff to provide services, expertise, and advice to our clients. Additionally, we work with external contractors to provide specialist services to clients where we are unable to do so in house. Our suppliers can include temporary staff, agencies, IT, stationery and office suppliers, catering, hospitality and event companies, legal services and occupational health providers, among others.

Our policies

We uphold the highest standard of professional conduct in our business dealings, acting with integrity and demonstrating the fair, equal and humane treatment of all people.

Our values are the intrinsic drivers for every decision we make as a company. They inspire our interactions with each other, with our customers and with our wider community.

Respect every person: We build trust by respecting the dignity, worth, and well-being of everyone without exception. We seek to understand and always assume positive intent. We are open, empathetic and acknowledge everyone for their unique contributions to our team.

Act with Integrity: We are open, honest, and kind with each other. We provide clear feedback with compassion and intention, and we receive feedback with curiosity. We hold ourselves accountable to do what we say we'll do.

Strive for Better: We devote time and energy to understand who we're helping, what they need, and how we can serve them. Curiosity and courage help us to solve problems and strive for better. We listen, learn and work hard to always improve ourselves and our results.

Embrace Change: We tackle challenges with courage and an open mind. We push ourselves to try new things, learn from failure, and forge ahead. We know growth and innovation require change, and we embrace change as essential to ours and our client's success.

Deliver as a Team: We work together to deliver exceptional results to our clients and to each other. Our openness leads to better collaboration, and we show up for one another. We gain strength from being part of one team and win by delivering solutions that benefit our clients, our business, and our colleagues.

Our partners and our people are required to comply with these values and to avoid any direct or indirect harassment, victimisation or discrimination of colleagues, suppliers or other third parties. Such behaviour may be deemed as gross misconduct which could result in serious disciplinary action and/or dismissal. Discriminatory behaviour, victimisation and harassment is also governed by the Equality Act 2010, which makes such practices unlawful.

All employees also have access to a clear Whistleblowing policy, which was revised and improved in 2023. Employees and contractors are encouraged to raise any concerns that they may have about the conduct of others, or business practices. Our policy clearly sets out that such concerns are reported in strict confidence to their manager and or the Cloud21 people team and explains the full legal protection which applies to anyone who makes a disclosure.

There have not been any reported incidents of slavery or trafficking during the year.

Risk assessment and due diligence processes

We provide consultancy services, primarily in the UK, which is considered a low-risk activity in regard to slavery and human trafficking, but we continue to assess the threats of slavery and human trafficking occurring within our operations.

Our recruitment policies ensure that all candidates produce documentation confirming that they have the right to work in the UK, prior to commencing employment. All employees and contractors are engaged on written contracts which guarantee their pay and conditions.

In our supply base, the relationship with most suppliers has been established over some years and have sought to establish where possible that significant suppliers share our zero-tolerance approach to forced labour.

Steps for the next financial year will be to ensure our onboarding and diligence process requires all new suppliers' approach to modern slavery will be confirmed before they are able to commence a relationship with Cloud21 and ask suppliers to confirm what steps they take to ensure these risks are not present within their own supply chains.

Referring to the International Labour Organisation's Indicators of Forced Labour, Cloud21 has not found, or been made aware of, any such instances in our business or supply chain.

Training and raising awareness

This statement is easily accessible to our employees and contractors via our SharePoint document library and is signposted along with our whistleblowing policy as part of the Cloud21 induction process. Cloud21 plans to roll out Modern Slavery awareness training to all employees as part of our mandatory training matrix in 2024 via our online training platform.