



**Speech & Language Therapy
West Midlands Ltd.**

Modern Day Slavery Statement

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| Date of policy: | January 2025 |
| Last policy review date: | February 2026 |
| Next policy review due: | February 2027 |
| Person/s responsible: | Company Directors |

This policy is under regular review. Updates will be made to reflect developments in procedures and best practice

For the Financial Year Ending 31 March 2027

1. Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Speech and Language Therapy West Midlands Ltd. has taken and continues to take to ensure that modern slavery and human trafficking are not taking place within our business or supply chains.

Speech and Language Therapy West Midlands Ltd. is an independent healthcare provider delivering autism and ADHD assessment and treatment services and Speech and Language Therapy services to children, young people and adults. Services are delivered privately and through NHS-commissioned pathways, including the Right to Choose pathway, under the NHS Standard Contract.

We recognise our responsibility to identify and mitigate the risks of modern slavery, human trafficking and labour exploitation within both our organisation and the wider healthcare workforce supply chain.

2. Our Organisational Structure and Services

We are a UK-based SME specialising in neurodevelopmental assessment and treatment services. Our operations are primarily based in England and involve the engagement of qualified healthcare professionals including:

- Psychologists
- Mental Health Nurses
- Psychiatrists
- Occupational Therapists
- Speech and Language Therapists
- Specialist Autism and ADHD Practitioners
- Administrative and operational staff

As an independent provider delivering NHS-commissioned services under the NHS Standard Contract, we recognise our obligations to ensure safe, ethical recruitment practices and safeguarding of staff and service users from exploitation, abuse and trafficking.

3. Policies in Relation to Modern Slavery

We operate a range of organisational policies that support our commitment to preventing modern slavery and human trafficking, including:

- Recruitment Policy
- Safeguarding Children & Adults Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Equality, Diversity and Inclusion Policy

Our safeguarding procedures include the identification and reporting of potential indicators of modern slavery, human trafficking or labour exploitation in both children and adults accessing our services.

4. Due Diligence Processes

Staff Recruitment and Workforce Engagement

We operate proportionate recruitment and workforce engagement processes appropriate to our role as a clinical healthcare provider, including:

- Enhanced DBS checks for clinical and non-clinical staff
- Verification of professional qualifications
- Registration checks with relevant professional bodies (e.g. HCPC)
- Right to work checks
- Identity verification and employment history review
- Transparent contracts for employed and associate clinicians

We recognise that flexible, associate and internationally trained healthcare professionals may be at increased risk of unfair or coercive employment practices and we therefore monitor engagement terms to ensure:

- voluntary participation
- transparency of working arrangements
- fair remuneration
- appropriate termination arrangements

Agency and Associate Clinicians

Where clinical staff are engaged via third-party agencies or as independent associates, we seek assurance that these providers:

- operate fair and ethical recruitment practices
- undertake appropriate safeguarding checks
- verify identity and right-to-work documentation
- comply with the Modern Slavery Act 2015

5. Supplier Management

Our supply chain is limited and primarily includes:

- Clinical workforce providers
- IT and digital health platforms
- Training providers
- Office and operational suppliers

We undertake basic due diligence when engaging new suppliers and maintain clear contractual agreements which include expectations regarding ethical working practices and compliance with relevant legislation.

Preference is given to established UK-based suppliers where appropriate.

6. Risk Assessment and Management

As a healthcare assessment provider, our operations primarily involve professional service delivery by regulated clinicians. We recognise that the greatest risks of modern slavery within our sector arise not from direct service delivery but from workforce supply chains including:

- clinical staffing agencies
- international recruitment practices
- subcontracted diagnostic services
- digital platform providers
- outsourced support services

We undertake periodic internal review of recruitment practices, supplier engagement and workforce management processes in line with NHS safeguarding and governance expectations.

7. Training and Awareness

Modern slavery awareness forms part of the Core Skills Framework safeguarding training programme to ensure staff understand the overlap between trafficking, exploitation, neglect and wider safeguarding risks.

Training includes:

- understanding modern slavery and human trafficking
- recognising indicators of exploitation
- reporting procedures
- safeguarding responsibilities

8. Measuring Effectiveness

We assess the effectiveness of our approach through:

- annual review of recruitment processes
- review of workforce engagement arrangements
- documentation of reported concerns
- supplier and agency contract review
- staff supervision and feedback processes

These measures are proportionate to our organisational size and the nature of our services and will continue to develop as our organisation grows.

9. Social Value Commitment

As part of our commitment to social value within NHS-commissioned services, we will continue to strengthen ethical procurement and workforce practices in line with the NHS Standard Contract and the Social Value Model (PPN 06/20).

10. Governance and Accountability

The Directors have overall responsibility for ensuring compliance with the Modern Slavery Act 2015 and receive periodic assurance regarding recruitment, safeguarding and supplier engagement processes.

11. Approval

This statement has been approved by the organisation's Directors and will be reviewed and updated annually.

Signed:

Sarah Barker



Louise Engers



Dr Sarah Titchin



Date: February 2026

Speech and Language Therapy West Midlands Ltd.

Company Registration Number: 15722636