

LEAD CLINIC

Modern Anti-Slavery Policy

1. Policy Statement

- **Zero Tolerance:** LEAD clinic has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings.
- **Commitment:** We are committed to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in your own business or supply chains.

2. Scope and Responsibility

- **Applicability:** This policy applies to all employees, agency workers, contractors, and suppliers.
- **Leadership:** The clinic's Director or Senior Management holds overall responsibility for ensuring this policy complies with ethical and legal obligations.

3. Risk Assessment and Due Diligence

- **Clinic Risk:** While we acknowledge the risk in a small healthcare clinic is generally low, vigilance is required in recruitment and procurement.
- **Supplier Vetting:** The LEAD Clinic will auditing suppliers to ensure they adhere to the same standards.
- **Recruitment:** We will ensure robust "right to work" checks for all staff and verify that any recruitment agencies used are vetted and follow ethical practices.

4. Related Internal Policies

- **Whistleblowing Policy:** Encourage staff to report concerns about treatment of colleagues or supplier practices without fear of reprisal.
- **Safeguarding Policy:** This policy links with our broader safeguarding duties for vulnerable children and adults.
- **Recruitment Policy:** Workers must not be charged recruitment fees and must have freedom of movement.

5. Training and Awareness

- **Staff Education:** Staff have several platforms to access training including the eLearning for health portal. This is explained at induction and will be checked periodically (e.g., every 2 years) to help them identify signs of exploitation.
- **Signs to Look For:** Patients or staff who are accompanied by controlling individuals, appear submissive, or show signs of physical neglect.

6. Reporting Suspicions

- **Immediate Danger:** If there is an immediate threat to life, call **999**.
- **Non-Emergency:** Contact the Modern Slavery Helpline at **08000 121 700** or report concerns to your local safeguarding lead.