



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

# Modern Day Slavery Statement

Date of policy:	January 2025
Policy review date:	March 2025
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 2025 (Published January 2025)

## **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 chain.

Speech and Language West Midlands Ltd. is a specialist healthcare provider delivering autism and ADHD assessment services, as well as Speech and Language Therapy services. We recognise our responsibility to be alert to the risks of modern slavery and human trafficking, both within our business and our supply chain. We are committed to acting ethically and with integrity in all our business relationships.

## **Organisational Structure**

We are a UK-based SME specialising in neurodevelopmental assessments, providing autism and ADHD assessment services and Speech and Language Therapy services. Our operations are primarily based in the West Midlands, and we utilise healthcare professionals including Psychologists, Occupational Therapists, Speech and language Therapists, Specialist Autism Practitioners and administrative staff. We are committed to maintaining the highest standards of ethical practice in all our operations.

## **Our Policies**

We operate the following policies that support our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

1. Recruitment Policy - We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees/contractors to safeguard against human trafficking or individuals being forced to work against their will.

2. Whistleblowing Policy - We encourage all employees, contractors, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
3. Code of Conduct - Our code makes clear to employees/contractors the actions and behaviour expected of them when representing our organisation.
4. Safeguarding Policy – our robust safeguarding policy makes clear to employees/contractors what they must do if they have concerns about a person's welfare

## **Due Diligence Processes**

### **Staff Recruitment and Employment**

- Enhanced DBS checks for all clinical and non-clinical staff
- Verification of professional qualifications and registrations with relevant bodies (e.g: HCPC)
- Right to work checks including face-to-face interviews and document verification
- Regular reviews of any agency contracts and labour providers
- Regular staff feedback sessions and annual reviews to monitor working conditions

### **Service Provider and Supplier Management**

- Basic due diligence checks when engaging new service providers (such as IT support)
- Annual review of ongoing supplier relationships
- Clear terms of business that include commitment to preventing modern slavery
- Preference for established local suppliers where possible
- Simple record keeping of supplier agreements and reviews

### **Operational Controls**

- Clear reporting channels for raising concerns, including anonymous reporting options
- Regular internal audits of recruitment practices and workforce management
- Documentation checks for all contracted staff including right to work
- Regular review of any outsourced service providers
- Monitoring of temporary and agency staff usage
- Implementation of ethical procurement guidelines

### **Risk Monitoring**

- Regular internal reviews of our recruitment and employment practices
- Monitoring of NHS and healthcare sector guidance on ethical employment
- Active engagement with local healthcare networks and professional bodies
- Review of UK government guidance on modern slavery risks
- Regular staff feedback on working conditions and concerns

### **Risk Assessment**

As a healthcare assessment provider, our operations primarily involve professional service delivery by qualified clinicians. We have assessed that our key risk areas are:

- Recruitment and employment of healthcare professionals and administrative staff
- Engagement with recruitment agencies and temporary staffing providers
- IT and software procurement
- Office supplies and equipment

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we provide training to our staff. This training covers:

- Understanding modern slavery and human trafficking
- Identifying signs of potential exploitation
- Reporting procedures

- Our organisational policies

## **Measuring Effectiveness**

We assess the effectiveness of our steps to prevent modern slavery in our business through:

- Annual review of our recruitment processes and employment records
- Documentation of any reported concerns and how they were addressed
- Regular staff feedback during team meetings and supervision sessions
- Review of supplier contracts and relationships at renewal These measures are proportionate to our size and the nature of our business, and we will develop them further as our organisation grows.

## **Looking Ahead**

As a growing assessment service provider, we recognise the importance of continually developing our approach to preventing modern slavery. Between January 2025 and March 2025, we will:

- Continue to include modern slavery awareness in our staff induction process
- Review our supplier agreements to ensure they include appropriate commitments to preventing modern slavery
- Maintain clear records of our due diligence checks on recruitment agencies we work with
- Ensure our whistleblowing policy is clearly communicated to all staff

We believe these steps are appropriate to our size and business model, and we will review and update them as our organisation develops.

## **Declaration**

This statement has been approved by the organisation's directors, who will review and update it annually.

Signed: Sarah Barker, Louise Engers, Dr Sarah Titchan

Position: Directors

Date: 6 January 2025

Speech and Language Therapy West Midlands Ltd.

Company Registration Number: 15722636