



## Modern Slavery Policy

1. Clinical Employment Services Ltd. is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Clinical Employment Services Ltd. is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.
3. Clinical Employment Services Ltd. provides appropriate training and awareness information for all of its staff.  
In particular:
  - Our recruiters, HR personnel, and/or staff involved in our procurement and supply chains undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.
  - All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to the managing director Mr Azzam Alkhafaji.
5. Reports surrounding these issues are taken extremely seriously by our board of directors, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:
  - Passing details to appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
  - The percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements,
  - The percentage of workers and/or candidates, supplied from audited businesses / our preferred supplier list,
  - The effectiveness of enforcement against suppliers who breach policies,
  - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
  - The level of modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
8. We would also recommend reading this in conjunction with our other policies, which can be sent when requested.



This policy was adopted on 03/06/2019 after being agreed by our board of directors. It is reviewed annually.



## Modern Slavery Statement

This statement is made as part of Clinical Employment Services Ltd.'s commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Clinical Employment Services Ltd. operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act, and relates to the financial year November 2022 to November 2023. It was approved by the board of directors on 03/06/2024.

Azzam Alkhafaji  
Managing Director

### 1 Our Business

Clinical Employment Services Ltd. is a limited company operating in the healthcare recruitment sector. We provide introduction services and supply temporary workers in the primary and secondary care sectors.

Clinical Employment Services Ltd. is an independent business.

#### 1.1 Who we work with

All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies.

#### 1.2 Other relationships

As part of our business, we also work with the following organisations:

- GMC and NMC
- the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com))

### 2 Our Policies

Clinical Employment Services Ltd. has a modern slavery policy available at the Shared Server Drive.

In addition, Clinical Employment Services Ltd. has the following policies which incorporate ethical standards for our staff and our suppliers.

- All our policies and procedures are accessible via our shared server which all employees have access to.

#### 2.1 Policy development and review

Clinical Employment Services Ltd.'s policies are established by our directors, based on advice from HR professionals, industry best practice and legal advice, and in consultation with our management team. We review our policies annually, or as needed to adapt to changes.



### **3 Our Processes for Managing Risk**

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We require the businesses we work with to abide by our code of supplier conduct / address modern slavery concerns in their policies.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.

Our staff are encouraged to bring any concerns they have to the attention of the directors.

### **4 Our Performance**

As part of monitoring the performance of Clinical Employment Services Ltd., we track the following general key performance indicators:

- Please refer to Section 6 above (The Modern Slavery Policy).

We benchmark our indicators against industry best-practice and discuss our indicators with suppliers, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

### **5 Our Training**

All of our staff receive training and support that is appropriate to their role. In particular:

Our recruiters, HR personnel, and/or staff involved in our procurement and supply chains undertake training courses that include guidance around modern slavery and human trafficking, as well as other wider human rights issues.

- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.



As part of this, our staff are encouraged to discuss any concerns that they have.  
Training is refreshed regularly.

*This policy will be reviewed on an annual basis and update where necessary in accordance with changes to current legislation and company processes.*