



ST CLAIR HEALTHCARE
RECRUITMENT SPECIALISTS

MODERN SLAVERY POLICY

1. St Clair Healthcare Limited is committed to eliminating modern slavery, human trafficking, forced labour and similar human rights abuses.
2. St Clair Healthcare Limited 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. St Clair Healthcare Limited provides appropriate training and awareness information for all of its staff.

In particular 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, Etienne St Clair.
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:
 - Working with the appropriate organisations to improve standards
 - Removing that organisation from our preferred supplier list
 - 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 workers 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. We would also recommend reading this in conjunction with our other policies, including our:
 - Corporate social responsibility policy
 - Ethical trading policy

This policy was adopted on 28 June 2022 after being agreed by our board of directors. It is reviewed annually.

ETIENNE ST CLAIR
Managing Director