

# Modern Slavery Statement

## Document Control Table

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0.2	24/04/2026	Chris Evans	Updated content and re-formatted as a Guidance document
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**Your mental health. Our expertise.**

Clinical Partners Ltd is a limited company registered in England. Registered number: 07590254.  
Registered office: Unit 6 Chaldicott Barns, Semley, Shaftesbury, England, SP7 9AW



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## Board Approval

This statement has been approved by the Board of Directors of Clinical Partners Group Limited and is signed on behalf of the Board by:

**Name:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Clinical Partners Group Limited's slavery and human trafficking statement for the financial year ending 31 December 2026. It will be published on the Clinical Partners Group Limited website with a link accessible from the homepage, in accordance with Home Office guidance.

## 1.0 Introduction

- 1.1 This statement sets out Clinical Partners Group Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the calendar year 1 January 2026 to 31 December 2026.
- 1.2 Clinical Partners Group Limited is one of the UK's leading providers of mental health services, operating across a number of clinical locations in England, Wales, Scotland, and Northern Ireland delivering both privately funded services and NHS-commissioned care. As a healthcare provider, we recognise the inherent responsibility that comes with operating in a sector that works with some of the most vulnerable people in society, and we take a robust and proactive approach to preventing modern slavery and human trafficking.
- 1.3 Clinical Partners Group Limited is committed to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.

## 2.0 Organisational Structure & Supply Chains

### 2.1 Organisational Structure

- 2.1.1 Clinical Partners Group Limited is a private limited company registered in England and Wales. It is one of the UK's leading providers of mental health services, working with both the private healthcare sector and the NHS. Clinical Partners Group employs a mixed workforce comprising employees, self-employed clinicians, and contractors. The organisation is governed by a Board of Directors and a Senior Leadership Team, with operational management devolved to clinical and corporate directorates.
- 2.1.2 Clinical Partners Group holds CQC registration as a regulated provider and operates under NHS Standard Contracts for its commissioned services. Corporate governance is overseen by the Board, with policy and compliance functions led by the Governance Team.

### 2.2 Countries of Operation and Supply

- 2.2.1 Clinical Partners Group currently operates in England, Wales, Scotland, and Northern Ireland, with the majority of services delivered in England. The primary supply chain relationships are with UK-based suppliers; however, digital platforms, software providers, and specialist equipment suppliers may operate or source from international markets where additional modern slavery risk may apply.

### 2.3 Supply Chains

- 2.3.1 Clinical Partners Group's supply chains encompass a range of goods and services, including but not limited to:

- **Clinical and healthcare services:** locum and agency clinical staffing, specialist therapeutic services, and diagnostic providers
- **Facilities and estates:** cleaning, maintenance, and facilities management contractors operating across our leased clinical locations
- **Information technology:** software, hardware, and digital infrastructure providers — including platforms accessed via Virtual Desktop
- **Professional services:** legal, financial, and HR advisory services
- **Consumables and equipment:** medical consumables, office supplies, and clinical equipment
- **Training and education:** external training providers and e-learning platforms

2.3.2 Clinical Partners Group acknowledges that supply chain risk varies by sector, geography, and the nature of labour involved. Sectors assessed as carrying higher inherent modern slavery risk include agency and temporary staffing, cleaning and facilities services, and technology hardware supply chains.

## 3.0 Policies in Relation to Modern Slavery & Human Trafficking

3.1 Clinical Partners Group maintains a suite of policies that directly or indirectly support the prevention of modern slavery and human trafficking. Responsibility for maintaining these policies rests with the People and Governance Teams, with oversight from the Policy Oversight, Implementation, and Approvals Group (POIAG) and ultimate accountability residing with the Board.

### 3.2 Primary Relevant Policies

- **Whistleblowing Policy:** Clinical Partners Group encourages all workers, patients, commissioners, and business partners to report any concerns related to its direct activities or the activities of its supply chains, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Clinical Partners Group's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation. Workers may raise concerns with their line manager, a member of the senior leadership team, or via the Freedom to Speak Up Guardian. Anonymous reporting channels are also available.
- **Supplier and Procurement Code of Conduct:** Clinical Partners Group is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Clinical Partners Group works with suppliers to ensure they meet the standards of the Code and improve worker conditions where necessary. Serious or repeated violations of the Supplier Code of Conduct will result in termination of the business relationship. The Code is provided to all new suppliers at the point of onboarding and is incorporated into supplier contracts.
- **Recruitment and Selection Policy:** Clinical Partners Group uses only specified, reputable employment agencies to source labour and verifies the practices of any new agency before

accepting workers from it. All recruitment processes include appropriate right-to-work and identity verification checks to reduce the risk of exploited or trafficked individuals entering Clinical Partners Group's workforce without detection.

### **3.3 Other Relevant Policies**

3.3.1 The following Clinical Partners Group policies are also relevant to the prevention of modern slavery and human trafficking:

- Freedom to Speak Up Policy
- Anti-Fraud, Corruption and Bribery Policy
- Prevent Policy
- Safeguarding Adults at Risk Policy
- Safeguarding Children and Young People Policy
- Risk Management Framework Policy
- Information Governance Policy
- Workforce and HR Policy Suite

## **4.0 Due Diligence Process**

4.1 Clinical Partners Group conducts due diligence on all new suppliers during onboarding and reviews existing supplier relationships at regular intervals. The due diligence process is designed to identify and mitigate risks of slavery and human trafficking across our supply chains.

### **4.2 Supplier Onboarding**

4.2.1 All new suppliers are subject to a structured validation process that includes:

- Assessment of the nature and risk profile of the goods or services being procured
- Review of supplier policies, including any existing modern slavery statements (where applicable under the Act)
- Assessment of supplier health and safety standards, labour relations, and employment practices
- Verification of supplier registration, financial standing, and regulatory compliance
- Where applicable, review of subcontracting arrangements and the labour practices of subcontractors

### **4.3 Ongoing Monitoring**

4.3.1 Clinical Partners Group's approach to ongoing supplier monitoring includes:

- Periodic review of high-risk supplier categories, including agency staffing and facilities management contractors
- Contractual requirements for suppliers to notify Clinical Partners Group of any material changes to their operations, workforce arrangements, or subcontracting structures
- Requirements for suppliers to cooperate with any audit or review initiated by Clinical Partners Group
- Escalation and investigation procedures where concerns are identified

#### **4.4 Supplier Attestation Requirements**

4.4.1 All suppliers engaged by Clinical Partners Group are required, as a condition of the supply relationship, to attest that:

- They do not use any form of forced, compulsory, or slave labour
- Their workers work voluntarily and are entitled to leave work
- Each worker is provided with a written employment contract containing a reasonable notice period
- They do not require workers to post a financial deposit or bond, and do not withhold salaries for any reason
- They do not require workers to surrender passports, identity documents, or work permits as a condition of engagement
- They comply with all applicable laws and regulations in the countries in which they operate
- They have in place, or are committed to developing, policies and controls to prevent modern slavery in their own supply chains

#### **4.5 Investigations and Concerns**

4.5.1 Concerns relating to modern slavery or human trafficking — whether involving Clinical Partners Group's own operations or supply chain partners — may be investigated by the Governance Team or People Team, depending on whether the concern relates to supplier practices, workforce matters, or staff conduct. All concerns are escalated to the Director of Governance, with governance oversight maintained throughout. Where there is reason to believe a criminal offence has occurred, Clinical Partners Group will report to the relevant authorities, including the National Crime Agency via the National Referral Mechanism (NRM) or the Modern Slavery Helpline.

## **5.0 Risk Assessment & Management**

### **5.1 Risk Assessment Process**

5.1.1 Clinical Partners Group assesses the risk of modern slavery and human trafficking through its corporate governance and risk management framework, aligned with CQC regulatory requirements. The risk assessment process involves:

1. **Identification:** Risks are identified through supplier due diligence, operational reviews, staff reporting via the whistleblowing or Freedom to Speak Up channels, external intelligence (including Home Office and sector guidance), and periodic horizon scanning by the Governance Team.
2. **Assessment:** Identified risks are assessed by reference to the likelihood and potential impact of modern slavery occurring, taking into account factors including the nature of goods and services procured, the geographic location of suppliers and their operations, the use of subcontracting or agency labour, the level of oversight Clinical Partners Group is able to exercise, and the vulnerability profile of the individuals involved.
3. **Recording:** Identified modern slavery risks are recorded in Clinical Partners Group's corporate risk register, with ownership assigned to a named senior leader and governance oversight maintained by the Risk Management function.
4. **Mitigation and Review:** Appropriate mitigation actions are implemented, including enhanced due diligence, contractual safeguards, policy updates, and training. Risks are reviewed periodically, and no less than annually, with progress against mitigation actions reported to the Board.

## 5.2 Risk Profile

5.2.1 Clinical Partners Group has assessed the following areas as carrying the highest inherent modern slavery risk within its operations and supply chains:

- **Agency and temporary clinical staffing:** The use of third-party staffing agencies introduces risk of labour exploitation, particularly where agencies source workers internationally or use complex subcontracting arrangements.
- **Facilities management and cleaning services:** These sectors are known to carry elevated modern slavery risk, particularly where workers are engaged on insecure or minimum wage contracts.
- **Technology hardware:** Hardware manufacturing supply chains may involve forced labour in component production, particularly where sourcing occurs in higher-risk jurisdictions.

5.2.2 Clinical Partners Group is committed to ongoing monitoring of these risk areas and to strengthening its mitigation controls as the operating landscape evolves.

## 6.0 Key Compliance Indicators

6.1 Clinical Partners Group uses the following key performance indicators (KPIs) to assess the effectiveness of its actions to prevent modern slavery and human trafficking:

KPI	Measure	Target	Reporting Frequency
Workforce training completion	Percentage of all workforce completing modern slavery awareness training	100% within probationary period; refreshed every 3 years	Quarterly

KPI	Measure	Target	Reporting Frequency
Supplier attestation compliance	Percentage of active suppliers who have signed Clinical Partners Group's modern slavery attestation	100% of suppliers onboarded from January 2026	Annually
Supply chain verification	Number of suppliers subject to enhanced due diligence review	All suppliers in high-risk categories reviewed annually	Annually
Concern reporting	Number of concerns related to modern slavery reported via whistleblowing or FTSU channels	Monitored for trends; all concerns investigated	Annually
Policy compliance	Completion of annual modern slavery statement within statutory timeframes	Statement published by 31 January each year	Annually

6.2 Performance against these KPIs is reported to the Board annually and forms part of Clinical Partners Group's broader governance and compliance reporting cycle. Where KPI performance falls below target, the Governance Team will identify root causes and implement remedial actions, reporting progress to the Board at the next available meeting.

## 7.0 Training

7.1 Clinical Partners Group recognises that training is a fundamental element of its approach to preventing modern slavery and human trafficking. Clinical Partners Group's training approach is as follows:

- **Mandatory awareness training:** All new members of the workforce, regardless of their employment status, are required to complete modern slavery awareness training as part of their induction. This training covers recognition of signs of modern slavery and human trafficking, the obligations of Clinical Partners Group and its workforce under the Modern Slavery Act 2015, how to report concerns safely and without fear of retaliation, and Clinical Partners Group's relevant policies and procedures.
- **Refresher training:** Modern slavery awareness training is refreshed every three years for all members of the workforce, or sooner where material changes in legislation, guidance, or Clinical Partners Group's risk profile make an earlier refresh necessary.
- **Role-specific training:** Staff with specific roles in procurement, recruitment, supplier management, or safeguarding receive additional, role-specific training on modern slavery risk assessment and due diligence. This is coordinated by the People Development Team in conjunction with the Governance Team.
- **Senior leadership:** Board members and senior leaders receive annual briefings on modern slavery risk and Clinical Partners Group's obligations under the Modern Slavery Act 2015, as part of the organisation's broader governance training programme.

7.2 Training delivery and completion is coordinated by the People Development Team as part of the wider People Team function, with records maintained in Clinical Partners Group's workforce management systems.

## 8.0 Review

### 8.1 Review Cycle

8.1.1 This statement will be reviewed annually by the Director of Governance, in conjunction with the People Team and Governance Team, to ensure it remains accurate, complete, and reflective of Clinical Partners Group's current operations, supply chains, and risk profile.

### 8.2 Triggers for Interim Review

8.2.1 In addition to the annual review cycle, this statement will be reviewed, and updated if necessary, in response to:

- Material changes to Clinical Partners Group's organisational structure, supply chains, or geographic footprint
- Significant changes in legislation, Home Office guidance, or sector-specific modern slavery requirements
- A substantiated modern slavery concern or incident affecting Clinical Partners Group's operations or supply chains
- Recommendations arising from an external audit, regulatory inspection, or commissioning review
- Changes to NHS Standard Contract requirements relating to modern slavery obligations

### 8.3 Review Responsibility

Role	Responsibility
Board of Directors	Approval and sign-off of the annual statement
Chief Executive Officer	Ultimate organisational accountability
Director of Governance	Lead reviewer; coordinating updates with relevant teams
People Team	Review of workforce-related provisions and training data
Procurement / Finance Lead	Review of supply chain due diligence provisions and KPI data
Policy Oversight, Implementation, and Approvals Group (POIAG)	Quality assurance of the statement prior to Board submission

## 8.4 Publication

8.4.1 Following Board approval, this statement is published on Clinical Partners Group's external website with a link accessible from the homepage, in accordance with section 54(7) of the Modern Slavery Act 2015 and Home Office guidance on transparency in supply chains.

## 9.0 Definitions

9.1 For the purposes of this statement, the following terms have the meanings set out below:

Term	Definition
<b>Modern Slavery</b>	An umbrella term encompassing a range of serious crimes and violations of fundamental human rights. It includes slavery, servitude, forced and compulsory labour, and human trafficking, as defined in the Modern Slavery Act 2015.
<b>Slavery</b>	A situation in which a person exercises ownership over another individual, treating them as property and compelling them to work without freedom or choice.
<b>Servitude</b>	A situation in which a person is obliged to work for another and cannot change their situation, even if they do not live in the employer's home.
<b>Forced Labour</b>	Work or services which a person performs involuntarily and under the menace of a penalty, threat, or coercion. Indicators include debt bondage, restriction of movement, retention of identity documents, threats, and physical or psychological abuse.
<b>Compulsory Labour</b>	Labour exacted from a person under the threat of a penalty and which that person has not offered voluntarily.
<b>Human Trafficking</b>	The recruitment, transportation, transfer, harbouring, or receipt of a person for the purpose of exploitation, using coercion, deception, or other means to exert control over them. Exploitation includes sexual exploitation, forced labour, domestic servitude, organ harvesting, and criminal exploitation.
<b>Child Labour</b>	Work that deprives children of their childhood, their potential, and their dignity, and that is harmful to their physical and mental development. This encompasses work below the minimum legal age, hazardous work, or work performed under duress.
<b>Debt Bondage</b>	A situation in which a person is forced to work to repay a debt, where the terms of the debt are such that its repayment is impossible, illegal, or indefinite. This is a form of forced labour and one of the most common tools of modern slaveholders.
<b>Domestic Servitude</b>	A form of forced labour in which the victim is compelled to work in a private household, often in conditions of severe exploitation, isolation, and control.
<b>Labour Exploitation</b>	A broad term covering situations in which workers are subjected to unfair, unsafe, or degrading working conditions, below legal standards of pay, coercion, or denial of rights.

<b>Term</b>	<b>Definition</b>
<b>Supply Chain</b>	The network of organisations, people, resources, activities, information, and technology involved in the sourcing, procurement, and delivery of goods and services that Clinical Partners Group uses in its operations.
<b>Supplier</b>	Any third-party organisation that provides goods or services to Clinical Partners Group, whether directly or through a subcontracting arrangement.
<b>Due Diligence</b>	The process of investigation and assessment that Clinical Partners Group conducts to identify, prevent, mitigate, and account for potential adverse human rights impacts, including modern slavery risks, in its operations and supply chains.
<b>Whistleblowing</b>	The disclosure, by a worker, of information which they reasonably believe evidences wrongdoing, malpractice, or a risk to health, safety, or the environment, including concerns about modern slavery. Clinical Partners Group's whistleblowing procedures protect workers who make such disclosures in good faith from detriment or retaliation.
<b>Freedom to Speak Up (FTSU)</b>	A culturally embedded approach, supported by an appointed FTSU Guardian, enabling all members of Clinical Partners Group's workforce to raise concerns safely and without fear of retaliation, in alignment with NHS whistleblowing good practice.
<b>National Referral Mechanism (NRM)</b>	The UK government framework for identifying victims of human trafficking and modern slavery and ensuring they receive appropriate support. Competent Authorities within the NRM make formal decisions on whether individuals are victims of modern slavery.
<b>Workforce</b>	All individuals engaged by Clinical Partners Group in any capacity, including employees (both full-time and part-time), self-employed clinicians, contractors, agency workers, volunteers, and board members.
<b>Attestation</b>	A formal declaration, signed by an authorised representative of a supplier, confirming that the supplier meets Clinical Partners Group's standards in relation to modern slavery and ethical employment practices.
<b>Transparency in Supply Chains (TISC)</b>	The requirement under section 54 of the Modern Slavery Act 2015 for qualifying commercial organisations to publish an annual statement setting out the steps they have taken to ensure modern slavery is not occurring in their operations or supply chains.
<b>KPI (Key Performance Indicator)</b>	A quantifiable measure used by Clinical Partners Group to assess its effectiveness in ensuring modern slavery does not occur in its business or supply chains.

## 10.0 References

10.1 The following legislation, statutory guidance, and sector-specific frameworks inform this statement and Clinical Partners Group's approach to preventing modern slavery and human trafficking:

### 10.2 Primary Legislation

Reference	Description
Modern Slavery Act 2015	The primary legislation governing the prevention of modern slavery and human trafficking in the UK. Section 54 sets out the requirement for qualifying commercial organisations to publish an annual transparency statement.
Human Rights Act 1998	Incorporates the European Convention on Human Rights (ECHR) into UK law, including Article 4 (prohibition of slavery and forced labour).
Equality Act 2010	Provides protections against discrimination and exploitative treatment in the workplace.
Immigration, Asylum and Nationality Act 2006	Sets out obligations on employers regarding right-to-work checks and the prevention of illegal working, which are relevant to reducing the risk of exploited workers entering the workforce.
Nationality and Borders Act 2022	Introduced reforms to the identification and support of modern slavery victims, including changes to the National Referral Mechanism.
Criminal Justice Act 2003	Provides the framework for criminal penalties relevant to human trafficking and exploitation offences.
Health and Safety at Work etc. Act 1974	Imposes duties on Clinical Partners Group as an employer in relation to the health, safety, and welfare of workers, including those in its supply chain where CPG has relevant control.

### 10.3 Statutory Guidance and Codes of Practice

Reference	Description
Home Office — Transparency in Supply Chains: Guidance (2017, updated)	The primary statutory guidance on compliance with section 54 of the Modern Slavery Act 2015, including the six areas that the annual statement should cover.
Home Office — Modern Slavery: Statutory Guidance for England and Wales (2023)	Comprehensive guidance on the Modern Slavery Act 2015, including identification of victims, the National Referral Mechanism, and obligations on public bodies and commercial organisations.
Independent Anti-Slavery Commissioner — Annual Reports	Strategic direction and recommendations for combating modern slavery in the UK, relevant to Clinical Partners Group's ongoing approach.
CQC — Single Assessment Framework (2023)	The CQC's current assessment framework, under which Clinical Partners Group is regulated. Relevant to safe and ethical governance of workforce and supply chains.

Reference	Description
NHS — Standard Contract (current version)	NHS Standard Contract provisions relating to modern slavery, including clause obligations on providers to comply with the Modern Slavery Act 2015 and report any concerns.
NHS — Procurement Policy Note: PPN 02/23	Guidance on modern slavery considerations in NHS procurement processes.
Home Office — Supplier Code of Conduct	Reference code informing Clinical Partners Group's own supplier standards and attestation requirements.

#### 10.4 Professional and Sector Standards

Reference	Description
Care Quality Commission (CQC) — Fundamental Standards	Regulations 5, 12, 17, and 19, which set out requirements for fit and proper persons, safe care, good governance, and staffing — all relevant to Clinical Partners Group's ethical workforce and supply chain management.
NHS England — Workforce Standards	Standards relating to the ethical engagement of clinical and non-clinical workforce, relevant to Clinical Partners Group's use of agency and self-employed clinicians.
Gangmasters and Labour Abuse Authority (GLAA) — Guidance	Guidance on identifying and reporting labour exploitation, particularly relevant to Clinical Partners Group's use of agency staffing and facilities contractors.

## 11.0 Related Documents

11.1 This statement should be read in conjunction with the following Clinical Partners Group Limited policies, procedures, and governance documents:

- Whistleblowing Policy
- Freedom to Speak Up Policy
- Supplier and Procurement Code of Conduct
- Recruitment and Selection Policy
- Anti-Fraud, Corruption, and Bribery Policy
- Safeguarding Adults Policy
- Safeguarding Children and Young People Policy
- Risk Management Framework Policy
- Information Governance Policy
- Business Continuity and Disaster Recovery Policy
- Health and Safety Policy