

Version: Draft 1.0 | Date: January 2026

Prepared by: Oxford Psychiatry Group | Reviewed by: Registered Manager Saba Iqbal

Review: January 2027

Organisational Commitment

Oxford Psychiatry Group has a zero-tolerance approach to modern slavery, human trafficking, forced labour, and exploitation in all areas of its operations and supply chain.

We are committed to upholding the rights and freedoms set out in the Human Rights Act 1998 and fulfilling our obligations under the Modern Slavery Act 2015.

This statement demonstrates our active approach to risk identification, prevention, monitoring, and continuous improvement, rather than a passive declaration of intent.

Organisational Structure and Activities

Oxford Psychiatry Group is a UK-based, CQC-regulated provider of remote outpatient mental health services.

Our workforce includes:

- GMC-registered Consultant Psychiatrists
- Employed and contracted clinicians
- Administrative and operational staff
- Third-party service providers (e.g. IT systems, payment processors)

We operate within:

- Health and Social Care Act 2008 (Regulated Activities Regulations 2014)
 - CQC Fundamental Standards
 - Safeguarding frameworks under the Care Act 2014
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Risk Assessment

We undertake a risk-based assessment of modern slavery exposure, recognising that risk varies across different parts of the organisation:

Low Risk Areas

- Direct clinical workforce (UK-regulated professionals subject to CQC: Regulation 19 recruitment checks)
- Internal administrative staff

Medium Risk Areas

- Contractors and locum clinicians (mitigated through recruitment and verification processes)
- Third-party service providers (e.g. IT, digital platforms, payment systems)

Potential External Risk Areas

- Cloud infrastructure supply chains
- Overseas service providers (where applicable)

All identified risks are recorded within the organisational risk register and reviewed annually.

Controls and Mitigation Measures

Oxford Psychiatry Group has implemented robust preventative controls, including:

Safer Recruitment (CQC: Regulation 19)

- Identity verification
- Right to work checks
- Enhanced DBS checks
- Professional registration verification (e.g. GMC)
- Employment history and reference checks
- Fit and Proper Person assessment (Regulation 5 for directors)

KPI: 100% of staff and contractors undergo full recruitment checks prior to engagement.

Supply Chain Due Diligence

- All suppliers are required to comply with the Modern Slavery Act 2015
- Supplier onboarding includes:
 - Legitimacy checks
 - Risk-based assessment
 - Contractual compliance requirements
- Contracts include:
 - Ethical working clauses
 - Right to terminate for non-compliance

KPI: 100% of new suppliers subject to due diligence checks.

Safeguarding Integration (CQC: Regulation 13)

Modern slavery is treated as a safeguarding issue.

Clinicians are trained to identify indicators of:

- Exploitation
- Coercion
- Trafficking
- Abuse linked to vulnerability

Concerns are escalated via safeguarding procedures to:

- Local safeguarding authorities
- Police (where required)

KPI: 100% of staff complete safeguarding training annually.

Whistleblowing and Reporting

- Staff can raise concerns confidentially via whistleblowing policy
 - Concerns are investigated promptly
 - No detriment policy applies to reporters
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Monitoring and Governance

Modern slavery risk is actively monitored through:

- Annual policy review
- Inclusion within governance and risk management framework
- Reporting to senior leadership
- Incident reporting and investigation systems
- Supplier review processes

Oversight is provided by the:

- Registered Manager: Saba Iqbal
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Training and Awareness

All staff receive:

- Safeguarding training (including exploitation awareness)
- Equality, Diversity and Human Rights training
- Induction covering ethical and legal responsibilities

Training is:

- Mandatory at induction

- Refreshed annually
 - Monitored via training compliance records
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Performance Indicators (Assurance)

Oxford Psychiatry Group measures effectiveness through:

- 100% recruitment compliance (Regulation 19 checks)
 - 100% safeguarding training compliance
 - 100% supplier due diligence at onboarding
 - Annual review of supplier risk
 - Incident reporting (including zero-reporting where applicable)
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Continuous Improvement

We are committed to ongoing improvement through:

- Annual review of this statement
 - Updates following regulatory or legislative changes
 - Learning from incidents, audits, and governance reviews
 - Strengthening supplier oversight processes
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Accountability and Approval

Responsibility for implementation, monitoring and review of this statement sits with:

- Registered Manager: Saba Iqbal
 - This statement is reviewed and approved annually by senior leadership.
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Oxford Psychiatry Group is committed to ensuring that modern slavery risks are:

- Identified
- Assessed
- Mitigated
- Monitored

through a structured and accountable governance framework.

This statement reflects our commitment to ethical practice, patient safety, and human rights protection, and is supported by operational policies, training, and measurable controls.