



## **Modern Slavery & Human Trafficking Policy**

Blake Dental is committed to preventing labour exploitation and modern slavery. We recognise that, without conducting effective due diligence, using labour providers can increase the risk of modern slavery.

At Blake Dental, we reduce the risk of labour exploitation and modern slavery by conducting checks on all our labour providers before we work with them and regularly checking agency staff documentation to ensure our high standards are being met in practice.

This policy establishes what checks we carry out and how often.

We commit to never use a labour provider that offers labour rates lower than those established in the Charge Rates Guidance calculated by the Association of Labour Providers and published by the Gangmasters and Labour Abuse Authority. Our Business Manager is responsible for ensuring these prior and ongoing checks are completed in line with this policy. They report on compliance with this policy Dr Katie Blake, Principal Dentist.

### **Initial Screening**

Before working with a labour provider, we always check that:

- The company is licensed to provide temporary labour to our sector.
- The company's directors are not listed on the Employment Agency Standards Inspectorate's list of people that have been prohibited from running a labour provider due to past misconduct.
- The company only subcontracts with our authorisation and conducts their own due diligence on subcontractors when we give permission to subcontract.
- The company has a clear commitment to not charging recruitment fees and to covering the cost of recruitment when sourcing staff from overseas.
- The company has an accessible and transparent reporting mechanism that all staff can use to report concerns or issues.
- The company provides information to their staff on what optional services they offer, how much they cost, and how the workers can refuse or cancel them without penalty.

We will not do business with a labour provider that fails any of these initial screening checks.



### **Periodic Monitoring**

When we have agency workers on our site, we periodically review a sample of their key documents to ensure the standards we expect are being met.

Time-period – we conduct these checks at the end of every month

Sample size – we consolidate the names of all agency workers that have been on our site that month, regardless of how long they were on site for. We then randomly choose either the square root of the number of agency staff or five, whichever is larger.

Checked documents:







- Terms of engagement (we check that these agreements between the worker and the labour provider matches the contract we have with the labour provider in terms of hours, pay, and working conditions)
- Payslips (we check that the number of hours match our records, that all workers are being paid at least the NMW, that optional services are clearly indicated, and that correct taxes and national insurance contributions are being paid)
- Right to work checks

We keep evidence of these checks for our records.

If we identify any concerns or irregularities, we discuss this with the labour provider to ensure they are rectified. If the labour provider refuses or fails to rectify the issues, we report our concerns to the GLAA.



**Languages that we speak**

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|---|---|---|
|   |   |   |
| Justyna Filipaska<br><i>Head Dental Nurse</i>                                       | Dr Erik Anklert<br><i>Associate Dentist</i>   | Dr Raveena Patel<br><i>Associate Dentist</i>  |
| Polskie (Polish)  | Svenska (Swedish)   | ગુજરાતી (Gujarati)  |
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