



**Modern Slavery and Human Trafficking**  
**Policy**

**Mentalia Locums Ltd**

Mentalia Locums LTD

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## 1. Introduction

Mentalia Locums Ltd is committed to preventing modern slavery, servitude, forced labour and human trafficking in all areas of our business and supply chains. We recognise our responsibility to conduct business ethically and transparently and to implement effective systems and controls to safeguard against any form of exploitation.

This policy is made pursuant to the Modern Slavery Act 2015 and applies to all employees, directors, contractors, candidates, suppliers, and business partners engaged with Mentalia Locums Ltd.

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## 2. Our Organisation

Mentalia Locums Ltd is a specialist recruitment agency supplying locum mental health and allied health professionals to healthcare providers across the UK and internationally. The professionals we place include (but are not limited to):

- Psychologists
- Psychiatrists
- Occupational Therapists
- Social Workers
- Family Therapists
- Dietitians

As a recruitment business operating within the healthcare sector, we recognise that we have a responsibility to protect workers from exploitation and ensure ethical employment practices throughout our operations.

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## 3. Our Commitment

Mentalia Locums Ltd operates a zero-tolerance approach to modern slavery and human trafficking. We are committed to:

- Acting with integrity in all business relationships
- Ensuring transparency in our recruitment processes and supply chains
- Implementing and maintaining effective systems to prevent exploitation
- Ensuring all workers are treated fairly, lawfully and with dignity
- Continuously reviewing and improving our policies and procedures

We expect the same high standards from all organisations we work with.

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#### **4. Risk Assessment**

We recognise that recruitment businesses can be exposed to risks relating to:

- Worker exploitation or coercion
- Illegal payment practices or tax evasion schemes
- Vulnerable individuals being pressured into unfair working arrangements
- Non-compliant umbrella companies or intermediaries
- Supply chain partners failing to meet legal or ethical standards

We actively monitor and mitigate these risks through robust compliance and due diligence processes.

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#### **5. Recruitment and Compliance Procedures**

Mentalia Locums Ltd maintains comprehensive vetting and compliance procedures designed to ensure ethical recruitment and employment practices, including:

- Verification of identity and right-to-work documentation
- Professional registration and qualification checks
- Employment history and reference verification
- Enhanced DBS checks where required

- Ongoing compliance monitoring and re-verification
- Ensuring all workers are paid through compliant PAYE or approved umbrella companies
- Compliance with IR35 legislation and HMRC guidance

We do not engage with organisations or intermediaries who fail to meet legal, ethical or regulatory standards.

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## 6. Supply Chain Due Diligence

We are committed to ensuring that modern slavery is not present within our supply chain. As part of our onboarding and review processes, we:

- Conduct due diligence on suppliers and business partners
  - Require suppliers to comply with the Modern Slavery Act 2015
  - Assess compliance with employment, tax and regulatory obligations
  - Reserve the right to terminate relationships where concerns arise
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## 7. Reporting and Whistleblowing

Mentalia Locums Ltd encourages openness and transparency. Any concerns regarding modern slavery or unethical practices should be reported immediately.

Reports can be made confidentially to:

**Email:** [Info@mentialocums.co.uk](mailto:Info@mentialocums.co.uk)

All reports will be taken seriously, investigated promptly and handled in a confidential and sensitive manner.

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## 8. Training and Awareness

We are committed to raising awareness of modern slavery risks within our organisation. Relevant staff are supported to understand:

- Indicators of modern slavery and exploitation

- Their responsibilities in preventing unethical practices
  - How to report concerns appropriately
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## 9. Responsibility and Governance

The Directors of Mentalia Locums Ltd hold overall responsibility for:

- Implementing this policy
  - Monitoring compliance
  - Reviewing and updating the policy annually
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## 10. Approval

This policy has been approved by the Directors of Mentalia Locums Ltd and is reviewed on an annual basis.

Signed: 

**Mr Richard Coggins**  
**Managing Director, Mentalia Locums Ltd**  
**Date: 20<sup>th</sup> January 2026**