

## Modern Slavery and Human Trafficking Statement

This statement is made pursuant to s54(1) of the Modern Slavery Act 2015 and sets out St Andrew's Healthcare's modern slavery and human trafficking statement in relation to actions and activities for the financial year ending 31 March 2020.

We are committed to preventing slavery and human trafficking in our business activities and to ensuring that our supply chains are free from slavery and human trafficking.

### Organisational Structure

We are a charity and a unique and influential pioneer in mental health, with a reputation grown over 180 years. We have sites in Northampton, Birmingham, Essex and Nottinghamshire employing over 5,000 people, providing specialist and secure care and treatment in mental health and neuropsychiatry.

**We have adopted the following practices, policies and approaches to help us address any potential slavery or human trafficking risks:**

### People

- We have robust procedures in place for recruiting our workforce. We ensure that all applicants are legally entitled to work in the UK. All staff undergo a full DBS (Disclosure & Barring Service) check.
- We pay all staff above the National Minimum Wage.
- Our directors are checked against the Fit and Proper Person Regulations to ensure they are compliant with these Regulations before they take up their position.
- Our Staff Code of Conduct helps promote a culture where transparency, honesty and fairness are the norm. Our Code forms part of our contractual terms with our staff.
- Staff training (including Director training) is continually reviewed and updated to ensure every person has awareness of our regulatory compliance responsibilities including modern slavery, safeguarding and anti-bribery. Such training is mandatory and completion is actively monitored.

### Freedom to Speak Up (Whistleblowing)

- Our workforce and service users, as well as anyone we do business with, are encouraged to report and expose unethical or inappropriate activities, procedures or behaviour within our business and supply chain.
- Our Freedom to Speak Up and Whistleblowing Procedure is intended to make it easy for disclosures to be made without fear of consequence. The policy encourages people to raise concerns directly with their line manager, HR, any senior executive or through the Charity's appointed Freedom to Speak Up Guardians. There is also free access to an independent service through which to report any concerns.
- Any modern slavery or fraud concerns raised are thoroughly investigated by us and actioned appropriately in accordance with our robust procedures and standards and outcomes reported through our Board of Directors and, where relevant, our Audit & Risk Committee.

### Diversity and Equality

We are fully committed to proactively promote diversity, equality of opportunity and human rights for all and to creating a culture of inclusivity for the people who provide and use our services. The Charity's Board reviews the Charity's Diversity and Inclusion report and approves the Diversity and Inclusion Strategy annually.

### Procurement & Supply Chain

The Charity is committed to ensuring that its suppliers and supply chain adhere to the highest standards of ethics and integrity. We achieve this through our relationships and contractual requirements:

- Our procurement contracts contain a requirement for the supplier to ensure ongoing compliance with the Modern Slavery Act and allow us to terminate the relationship, should compliance not be maintained.
- All suppliers have to comply with our Supplier Code of Conduct which includes a specific requirement to comply with Act and to report any potential breaches to us immediately.

## **Review of Effectiveness**

Whilst we have had no modern slavery issues reported to date, we are committed to regularly reviewing our procedures and seek to continually improve our practices to prevent modern slavery and human trafficking.

In 2020/21, our activity will include:

- Updating our procurement guidance for staff to ensure that all new suppliers are appointed in conjunction with our Procurement Team so appropriate checks can be taken.
- Updating our procurement process to include (within our pre-qualification questionnaire) a mandatory exclusion question regarding the Modern Slavery Act. Any supplier unable to declare their compliance with the Act will be excluded from the procurement process.
- Reviewing our safeguarding strategy, policy and procedures and general training plan to ensure that modern slavery and human trafficking are adequately covered.

The Board approved this statement at its meeting on 24 September 2020.

*Katie Fisher*

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Katie Fisher, Chief Executive, St Andrew's Healthcare  
30 September 2020