

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 2025.

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 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 colleagues undergo a full DBS (Disclosure & Barring Service) check relevant to their role, before commencement of employment and subsequent random checks are regularly undertaken on colleagues through the course of employment.
- Our executive and non-executive directors are checked against the Fit and Proper Person Regulations to ensure they are compliant with these Regulations before they take up their position, and on an annual basis thereafter.
- Our Colleague Code of Conduct helps promote a culture where transparency, honesty and fairness are the norm.
- Colleague training (including director training) is continually reviewed and updated in line with national guidelines to ensure everyone 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

- Our colleagues 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.
- We have a number of Freedom to Speak Up Guardians working across our charity, including a Lead Freedom to Speak Up Guardian supporting our people to feel able to speak up. Our Freedom to Speak Up Policy 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. We have a number of staff networking groups which work closely with Freedom to Speak up Guardians, providing opportunities for anyone to raise concerns or provide feedback. This includes patients, carers and our workforce. There is also free access to an external, 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 Equity

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 or use our services. The Charity's Board approves the Charity's Diversity and Inclusion report and reviews the Diversity and Inclusion Plan annually.

Procurement & Supply Chain

We expect the same high standards and ethics from our suppliers as we do internally. We achieve this through our excellent relationships and managed and evolving contractual requirements. We actively manage supply chain risk through:

- **Procurement Governance:** All supplier onboarding is overseen by our Procurement team. We conduct risk-based due diligence on all new suppliers.
- **Modern Slavery Due Diligence:** Pre-qualification questionnaires cover labour practices, human rights, and compliance with modern slavery laws. Non-compliant suppliers are excluded from the procurement process.
- **Contractual Obligations:** Our standard contracts require compliance with the Modern Slavery Act requiring suppliers to take all reasonable steps to prevent modern slavery in their operations and supply chains. Failure to comply with these obligations will result in contract termination.
- **Supplier Code of Conduct:** the Supplier's Code of Conduct includes clear requirements and expectations regarding ethical labour practices and adherence to the Act. Suppliers are contractually obligated to comply with the Supplier's Code of Conduct and relevant legislation.
- **Ongoing Monitoring & Audits:** We conduct regular reviews and audits of our critical and high-risk suppliers to assess compliance with our modern slavery standards. Where concerns are identified, we engage directly with suppliers and, where necessary, implement corrective action plans or escalate to termination.

Review of Effectiveness

Whilst we have had no modern slavery issues reported to date, we continue to enforce our current procedures and working practices designed to tackle modern slavery and human trafficking. We are committed to regularly reviewing our procedures and seek continuous improvement of our practices to prevent modern slavery and human trafficking.

We will continue to review 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 18 September 2025.

Dr Vivienne McVey
Chief Executive Officer
St Andrew's Healthcare
18 September 2025