

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 2024.

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.
- 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, and on an annual basis thereafter.
- Our Colleague 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 colleagues.
- Colleague training (including Director training) is continually reviewed and updated to ensure everyone has awareness of our regulatory compliance responsibilities including modern slavery,

Freedom to Speak Up (Whistleblowing)

- 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 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 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 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 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

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 guidance for colleagues ensures that all new suppliers are appointed in conjunction with our Procurement Team so appropriate checks can be taken.

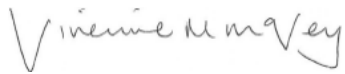
- Our procurement process includes questions (within our pre-qualification questionnaire) regarding the Modern Slavery Act. Any supplier unable to declare their compliance with the Act will be excluded from the procurement process.
- Our standard procurement contracts contain a requirement for the supplier to ensure ongoing compliance with the Modern Slavery Act and allow us to terminate the relationship, should compliance not be maintained.
- We have a Supplier Code of Conduct which includes a specific requirement to comply with Act.

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 17 July 2024.

A handwritten signature in blue ink that reads "Vivienne McVey".

Dr Vivienne McVey
Chief Executive Officer
St Andrew's Healthcare
17 July 2024