

## St Anne's Community Services

### Modern Slavery and Human Trafficking Statement - 2021

#### **Introduction**

Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude.

St Anne's is committed to preventing modern slavery in any of its corporate activities and supply chains. This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It sets out the actions and activities that have taken place during the financial year 1 April 2019 to 31 March 2020 to ensure that there is no slavery or human trafficking in our organisation and supply chains.

It covers the activities of both St Anne's Community Services and our subsidiary St Anne's Trading Ltd.

#### **Our Organisation**

St Anne's was founded in 1971 as a shelter for homeless men in Leeds and gradually expanded over the years to become the organisation it is today, with around 1,500 staff supporting over 1,300 people across the North of England.

We support people with learning disabilities, mental health issues, substance use and misuse and homelessness to help them achieve their aspirations and to live their best life possible.

We provide housing and accommodation-based care and support in partnership with other housing providers and we deliver a range of community-based services.

A Company registered by guarantee, we are regulated by the Care Quality Commission, the Regulator of Social Housing and The Charity Commission.

St Anne's Trading Ltd. is a subsidiary company. It is accredited by the British Institute of Learning Disabilities to provide specialist "Positive Behaviour Support" training and delivers training nationally throughout the United Kingdom, including Wales and Northern Ireland.

Our staff are largely directly employed and are not in any category which is generally seen to be vulnerable to modern slavery in this country, so our focus is to ensure there are policies and procedures in place for our contractors and suppliers.

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## Our Supply Chain

St Anne's is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains, and to acting ethically and with integrity in all its business relationships.

Our range of suppliers is vast and having reviewed our business, those which we deem to be most at risk from Modern Slavery are providers of building, maintenance and cleaning contractors, and IT equipment providers and suppliers. Our staff look to procure goods from reputable and suitable organisations.

## Policies and Control

St Anne's take a robust approach and operates the following policies to assist the identification and support steps to be taken to prevent modern slavery and human trafficking in our operations and procurement of services.

- **Procurement Policy**

We expect our suppliers to have internal policies and processes in place to meet the Modern Slavery Act 2015. A supplier without these policies in place will not meet our minimum requirements and will therefore not be used. A supplier with policies in place but found not to be adhering to them may have their contract terminated. We have several small providers who we would expect to sign up to related policies.

- **Safeguarding Policy**

Our safeguarding policy provides clear guidance to staff on the different types of exploitation covered under the Modern Slavery Act and how to report a suspicion.

- **Whistle-blowing Policy**

Our Whistle-blowing policy provides clear guidance on how to make a disclosure and sets out how whistle-blowing concerns are addressed and how the whistle-blower is supported.

- **Recruitment and Selection Policy**

**As a responsible employer we have safe and robust selection and recruitment procedures in place, including conducting UK eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. We monitor this on an annual basis to assure ourselves of its effectiveness. Due Diligence**

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As part of our due diligence with any new suppliers we require them to confirm their compliance with relevant legislation which includes Modern Slavery Act.

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.

We have a number of senior level staff who are trained and would be responsible for carrying out Root Cause Investigations (RCI) in relation to any suspected instances of modern slavery or human trafficking within St Anne's.

### Training

We have risk assessed our staff requirement for training. All our staff that have any involvement in procurement are required to attend face to face training. We have also identified some members of staff who work with client groups that may be exploited under the Modern Slavery Act 2015 and they are also required to attend face to face training.

### Further Actions 2020/21

We plan to implement an annual review of our suppliers' compliance with their policies under the Modern Slavery Act and ensure they understand our requirements on an ongoing basis.

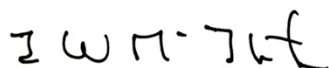
We plan to continue to provide information, training, and support for our staff as appropriate ensuring they understand the legislation and feel confident to report concerns.

We plan to strengthen the number of "Speak up" Guardians and local champions.

We plan to increase the range of systems and tools to support and to increase the confidence to people to speak up.

### Board Approval

This statement has been approved by the Board of Trustees of St Anne's Community Services who will review and update it annually



#### Signed by

**Name:** Ian McIntosh  
**Position:** Chair  
**Date:** 4 March 2021

On behalf of the Board of Trustees of St Anne's Community Services

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