



St Anne's Community Services
Modern Slavery and Human Trafficking Statement 2018/19

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 2018 to 31 March 2019 to ensure that there is no slavery or human trafficking in our organisation and supply chains. It covers the activities of St Anne's Community Services and St Anne's Trading Limited.

Our Organisation

St Anne's Community Services is a registered CQC Care provider of clients with learning disabilities and mental health. We also provide homeless services, are a registered charity, company limited by guarantee and registered social housing provider. We provide a large number of services across the North of England. Our care is delivered in residential social and nursing environments, supported living, shared care, domiciliary care, supported housing and homeless hostels.

Additionally, our subsidiary company St Anne's Trading Limited is a specialist (accredited by the British Institute of Learning Disabilities) training provider for Positive Behaviour Support and delivers training nationally throughout the United Kingdom, including Wales and Northern Ireland.

We have approximately 1400 staff all of whom are employed in the United Kingdom. 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.

Our Supply Chain

St Anne's Community Services 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.

Our staff look to procure goods from reputable and suitable organisations.

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Policies and Control

St Anne's takes 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 have processes in place to meet the Modern Slavery Act 2015. A supplier without these policies in place will not meet our minimum requirements, and a supplier with policies in place, but identified as not adhering to them may have their contract terminated. We do however have several small providers who we feel it is more appropriate to sign up to our own 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.

Recruitment and Selection Policy

As a responsible employer we have robust recruitment procedures, 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

As part of our due diligence with any new suppliers they are required to confirm compliance with relevant legislation, including the 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.

Our Quality Leads are trained and would be responsible for carrying out Root Cause Investigations 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.

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Further Actions 2019/20

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

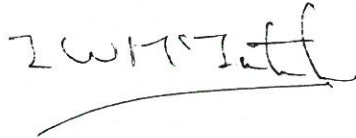
We plan to continue to provide information, training and support for our staff as appropriate ensuring they understand the legislation and feel confident to report concerns.

We plan to update our Whistleblowing Policy to include concerns related to modern slavery and human trafficking.

Board Approval

This statement was approved by the Board of Trustees of St Anne's Community Services on 27 March 2019. The Board will review and update it annually.

Signed by



Date

12 April 2019

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

This statement is applicable also to St Anne's Trading Limited, which is a subsidiary of St Anne's Community Services.

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