MODERN SLAVERY STATEMENT

For period April 2023 to March 2024

Introduction from the Chief Executive

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

This statement has been prepared in accordance with section 54 of the Modern Slavery Act 2015. It sets out The Orders of St John Care Trust's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. As part of the care sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and have referenced our responsibilities on Slavery and Human Trafficking in our Values of Respecting Each Other and Building Communities.

1. Organisational structure, its business and supply chains

The Orders of St John Care Trust Organisation

We are a not-for-profit charitable Trust providing care services for the aged, the infirm and the sick. We operate across a number of regions in the UK providing care in 61 care homes as well as a domiciliary care service in 8 extra care housing schemes. We have 4,461 employees and bank workers along with 590 volunteers (data accurate as of 31 March 2024).

The majority of our employees work within our care homes and extra care housing schemes. Supporting these operations are small functional teams including HR, Finance, Procurement, Marketing, IT, Care Quality, Health and Safety, Property and Transformation.

The Trust has its registered office at: Eyre Court, Whisby Way, Lincoln, LN6 3LQ.

Supply Chain

In delivery of our services, we utilise over 1,000 UK suppliers, including some who manufacture or source overseas. Through ongoing reviews of our supply chain, the areas we have identified as being at risk include:

- Goods contracts where manufacturing is undertaken in countries with less vigilant standards for health and welfare, for example uniform supply from China, and some food products and equipment sourced in Asia and the far east.
- Temporary staff agency services.
- Recruitment of overseas nurses and carers.

How we mitigate these risks is evidenced in the rest of the policy.

2. Policies in relation to slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

As a not for profit social care provider, The Orders of St John Care Trust has people, not profit, at its heart, whether those people are residents living in our homes and schemes, or those caring for them.

A skilled, diverse and valued workforce is essential in responding to the growing and increasingly complex needs of residents and to delivering the safe, high-quality care the Trust prides itself on. The Orders of St John Care Trust has made a significant investment in international recruitment, with 104 international nurses and carers now working in our homes to date (data accurate as of 31 March 2024). We have partnered with a reputable Healthcare Recruiter who specialises in international recruitment for the sector and who are recognised by the Department of Health and Social care as an ethical recruitment agency.

We have revised relevant policies to reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** We encourage all our employees to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees who have concerns can speak to a Senior Manager, Director or use our confidential helpline to raise them accordingly. This policy contains the Modern Slavery and Exploitation helpline details.

- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour at all times in our homes, schemes and offices.

- **Supplier code of conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of our supplier code of conduct will lead to the termination of the business relationship. A Supplier Code of Conduct has been developed, but our tender and due diligence processes already comprehensively address the Trust's requirements in this area, to ensure that we only engage suppliers that meet the high ethical standards aligned to our values. To date we have not identified any instances of modern slavery or human trafficking in our supply chains.

- **Modern Slavery Questionnaire** We issue a modern slavery questionnaire to our top 50 suppliers with a turnover of more than £250,000 where we consider there to be a greater risk of modern slavery occurring. Responses to the questionnaire are reviewed and we work with our suppliers to address any areas of concern. 16 suppliers have been identified as having a medium to high risk of modern slavery occurring in their supply chains.

Questionnaires have been issued to these suppliers asking for information relating to the prevention of modern slavery occurring and processes to identify modern slavery, together with requests to outline if Modern Slavery training is offered to raise awareness amongst colleagues and suppliers. Responses received indicate that Modern Slavery is taken very seriously within our supply chain.

3. Due diligence

Our procurement processes, documentation and standard contracts are all designed to identify and mitigate the risks of modern slavery throughout the end-to-end supply chain process and provide the Trust with the ability to address any instances identified.

We undertake due diligence when considering taking on new suppliers, and regularly review existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- conducting supplier audits or assessments where slavery and human trafficking risks are identified.
- maintain an annual risk profile for each supplier, adding new suppliers accordingly.
- the right to invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

The Trust, in its obligations to eradicate slavery and human trafficking, incorporates contractual requirements for its suppliers to confirm on an annual basis the steps it has taken to ensure the supplier and its supply chain comply with the law. The Trust's prequalification questionnaire and tenders impose similar obligations.

4. Supplier adherence to our Values and Ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics, we have put in place a rigorous supply chain compliance programme. This consists of:

- A clear statement in our Tender Document about our attitude to modern slavery and human trafficking and our requirements of our suppliers which ensures any new suppliers meet our criteria. Specifically, there are questions on Modern Slavery mitigation in the due diligence section of the tender document and inclusion of their latest Modern Slavery statement if applicable.
- A clause in our recruitment agency contracts (section 27), including those who directly source nurses and carers from overseas looking for relocation to the UK, regarding the obligation of our agencies and ourselves under the Modern Slavery Act 2015.
- Internal communication to ensure all our managers and procurers are aware of and commit to delivering our policy and approach concerning modern slavery and human trafficking.

5. Performance indicators/effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chain

We use the following key performance indicator (KPI) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Initial questionnaire responses via the tender and due diligence processes confirming a supplier's modern slavery position, prior to a new supplier being engaged.

- An annual review by key/relevant suppliers to confirm there is no slavery in their supply chain. Suppliers, who have a turnover in excess of £250,000 to submit in writing a confirmation that the review has been completed and that no slavery or human trafficking has been identified in their supply chain.

6. Training

We require all employees within our organisation to complete training on modern slavery. This is completed as part of our induction process and employees are required to refresh this training every three years.

Along with raising general awareness to this area, our modern slavery training covers:

- Identifying what modern slavery is and who it can affect
- Highlighting some of the warning signs to look out for
- Identifying the role of technology with modern slavery and how it can also be used to help combat it
- Identifying the business's responsibilities under the Modern Slavery Act 2015
- Reporting methods that are available to refer potential victims

We also require our business partners to provide training to their staff and suppliers and providers.

We currently have 93.7% of our employees who have completed the modern slavery training.

7. Continuous Improvement

We are committed to continuously working to strengthen our approach to tackling the threat of modern slavery and human trafficking in our business and supply chain. Our journey continues in 2024/25 and our priorities for this period are as follows:

- Issue the Supplier Code of Conduct to all key/relevant existing and new suppliers
- Re-audit the top 50 suppliers by risk and spend currently engaged with The Orders of St John Care Trust
- Ensure that 100% of all new starters complete the Modern Slavery and Human Trafficking training module
- Strive for 95% compliance for our existing employees to have completed the Modern Slavery and Human Trafficking training module
- Review alternative training methods in addition to the eLearning module to further enhance awareness of Modern Slavery and Human Trafficking in the workplace
- Review the content of the policies named above in line with the Trust's schedule to ensure they remain current and relevant

Board Approval

This statement was approved on 25 September 2024 by our Board of Trustees.

A signed copy of this policy can be provided upon request.