St Anne's Community Services
Modern Slavery and Human Trafficking Statement - 2025

Introduction

Modern slavery encompasses slavery, human trafficking, forced labour, Debt bondage/bonded labour, descent-based slavery, Slavery of children (including child trafficking, child soldiers, child marriage, and child domestic slavery), forced and early marriage, and domestic servitude. Modern Slavery and Human Trafficking can affect anyone, regardless of ethnicity, gender, sexual orientation, age, socioeconomic status, or ability. However, those from disenfranchised groups or those who are vulnerable are particularly at risk.

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 2024 to 31 March 2025 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 struggles, substance dependencies, and those experiencing 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.

Title	Modern Slavery and Human Trafficking Statement 2025	Version No
Issue Date	31.03.2025	Final
Review Date	31.03.2026	

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 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 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 where the contract spend is over £100k to have internal policies and processes in place to meet the Modern Slavery Act 2015. We practice due diligence with all new contact providers by requesting Modern Slavery prevention compliance upon our new supplier form.
  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 operate in good faith when making one-off purchases with external providers, as it is not economically viable to check all external company policies for these transactions. For one-off suppliers, staff are expected to exercise their own judgement to assess the risks around modern slavery for the purchase they are making.

- **Safeguarding Policy**

  Our safeguarding policy explicitly names Modern Slavery as a form of abuse and a safeguarding concern. It provides guidance on how to report a suspicion of safeguarding concerns including Modern Slavery. Extra emphasis has been placed on training with a new Modern Day slavery eLearning package developed and rolled out to all staff and new starters.

- **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 whistleblower is supported. Modern Slavery practices such as human trafficking are explicitly given as an example to be classified as whistleblowing concern.

- **Recruitment and Selection Policy**

As an equal opportunity employer, we are committed to creating and ensuring a non discriminatory and respectful working environment for all our people. 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. In addition we have strengthened both training and checks for our contingent workforce, ensuring staff supplied to us are protected against human trafficking.

Volunteers

Will be thoroughly vetted and under no circumstances will volunteers be used in substitution of paid staff. No enforceable obligation, contractual or otherwise, can be imposed on volunteers to attend, give or be set a minimum amount of time to carry out the tasks involved in their voluntary activities. Volunteers undergo necessary training including mandatory safeguarding training. Volunteers are assigned an Learning & Development business advisor who liaise with the manager to ensure any additional training is required is provided. Additionally, all volunteers will be supervised appropriately by staff.

Student placements

St Anne's does consider student placements for the benefit of the students and the organisation, however, these placements are always voluntary and well-reviewed by St Anne's before they are agreed. Students placed with St Anne's will be appropriately trained and complete mandatory safeguarding training. Students are assigned an Learning & Development business advisor who liaison with their front line manager to ensure any additional training required is provided. Additionally, student placements are often paired with a staff mentor and will always be appropriately supervised.

Due Diligence

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

Members of our Quality and Continuous Improvement Team 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 bespoke staff training requirements based of job roles and services. All our staff that have any involvement in procurement are required to attend training. All staff, Trustees, volunteers, and student placements receive mandatory safeguarding training which discusses Modern Slavery as a safeguarding concern that should be addressed if suspected. Additionally, bespoke training can be provided upon request by managers, and St Anne's runs yearly Modern Slavery training.

Further Actions 2025/26

We plan to annually review 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 will review the success of the new eLearning packages to ensure specific modern day slavery training is embedded and where appropriate include elements within our new face to face induction package.

We plan to continue to work with our (and national) Freedom to Speak up Guardians and local champions which staff can raise concerns with.

Any instances where modern slavery is suspected or suggested, an appropriate investigation will be commenced and recommendations enforced.

Board Approval Signed by

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

Name: John Cleland
Position: Chair
Date: 31/03/2025

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