# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 March 2024.

Focus Mental Health Solutions is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

# **Organisational Structure**

Focus Mental Health Solutions and has business operations in the United Kingdom.

We operate in the health and social care sector. The nature of our supply chains is as follows: We work with a number of key direct suppliers, who provide us with goods, such as equipment, IT and services, such as Psychometric and Stationary providers.

For more information about the Company, please visit our website: www.focusmentalhealth.org.

### **Policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- Recruitment and selection policy
- Supplier code of conduct
- Whistleblowing policy
- Staff code of conduct
- Procurement policy
- Safeguarding policy

We make sure our suppliers are aware of our policies and adhere to the same standards.

### **Due Diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

• External supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

### **Risk and Compliance**

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

#### **Risk of Slavery and Human Trafficking**

We do not consider that we operate in a high-risk environment. The business operates in this risk level environment because our supply chain is based in the UK and in low-risk industries, such as internet software, IT and Psychometric services.

There is a low risk a child we see may have been Trafficked. Should this come to light our Safeguarding Policy will address this.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

### Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will train our staff about modern slavery issues and increase awareness within the Company.
- We will carry out a regular audit of suppliers 85% of suppliers each year.

## **Training Staff**

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

#### **Next Steps**

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by:

- Continuing to educate our staff
- Continuing audits of suppliers

The statement was approved by the Director