

## **Modern Slavery Statement**

Ludlow Street Healthcare make this Statement pursuant to Section 54 of the United Kingdom (UK) Modern Slavery Act 2015 (the "Act") to identify actions we have taken during the financial year ending March 31, 2021 to prevent slavery and human trafficking from occurring in our supply chains or our business. The organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking and 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. Ludlow Street Healthcare is committed to ensuring compliance standards are met and maintained.

### **ORGANISATION'S STRUCTURE**

We are a provider of care operating under the following subsidiary organisations;

- Ludlow Street Healthcare Ltd and
- Ocean community Services

In addition, we have a head office in Cardiff providing a number of centralised services.

### **OUR BUSINESS**

The business is organised into services with a Service Director in each reporting directly to the Operations Director. In turn, this position then reports into the Deputy Chairwomen and Chief Executive Officer. Our services are regulated by the Care Quality Commission (CQC), Care Inspectorate Wales (CIW) and Healthcare Inspectorate Wales (HIW). Our contracts come from Local Authorities and Clinical Commissioning Groups (CCG's).

### **OUR SUPPLY CHAINS**

Ludlow Street Healthcare is committed to ensuring that our business and chain of suppliers do not tolerate modern slavery, forced labour or human trafficking.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We have zero tolerance to slavery and human trafficking and 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. We are committed 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 chain or business.

### **Equal Opportunities and Safeguarding & Whistleblowing Policy**

Ludlow Street Healthcare encourages all its employees and workers to report any concerns. The Organisation's Speak Up (Whistleblowing) Policy is designed to make it easy for workers to make disclosures, without fear of retaliation. The policy encourages people to raise concerns directly with their Line Manager, HR Department, designated "Speak up Guardian" or any member of the senior management.

Anyone, including colleagues, suppliers, candidates and clients are encouraged to report any issue or concerns about potential unethical business practices, such as fraud, bribery, slavery or human trafficking and Ludlow Street Healthcare are committed to working with the local authorities to ensure such concerns are investigated properly and dealt with efficiently and effectively.

Our staff are encouraged to bring all and any concerns they have to the attention of management. We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and all contractors to comply with our values. All our directors are responsible for compliance in their respective departments and for their supplier relationships.

### **Recruitment**

As an Equal Opportunities Organisation, Ludlow Street Healthcare welcome candidates via a number of sources from online job searches, employee referrals and local recruitment initiatives. The organisation takes a rigorous approach in recruiting personnel. We converse directly with all candidates, to discuss vacancies and opportunities and to confirm details of any offer made. If a recruitment agency is working on our behalf to source candidates we work with trusted companies governed by The Recruitment & Employment Confederation (REC) and follow Government workforce legislation, data protection acts (GDPR), DBS and also associated to regulatory bodies such as the NMC, CQC. We have robust procedures in place for the vetting of new employees and workers and ensure that we are able to confirm their identities, their right to work in the United Kingdom and that they are paid directly into an appropriate, personal bank account. For any employee or worker with a work permit or visa, we carry out regular audits and management of these documents to ensure they remain valid. Ludlow Street Healthcare always apply national minimum wage thresholds in line with the relevant legislation.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

- As part of our initiative to identify and mitigate risk we have in place systems to:
- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all of our staff receive training and support that is appropriate to their role.

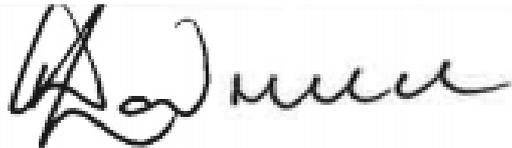
In particular

- all of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management, by way of our Whistleblowing Policy.

***This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and it constitutes our slavery and human trafficking statement for the financial year.***

Board Approval date: 09<sup>th</sup> April 2021

Signed:

A handwritten signature in black ink, appearing to read 'David Lawrence', written over a light grey horizontal line.

Print Name: David Lawrence

Job Title: Chief Executive Officer

Date: 09<sup>th</sup> April 2021