

## **Modern Slavery and Human Trafficking Statement**

### **What is modern slavery?**

Modern slavery is an international crime, affecting an estimated 29.8 million slaves around the world. It is a growing global issue that transcends age, gender and ethnicities. It includes victims who have been brought from overseas and vulnerable people in the UK, who are forced to illegally work against their will across many different sectors such as health, hospitality, construction, retail and manufacturing.

### **Our policy**

Cygnet has zero tolerance to slavery, human trafficking and violation of slavery law. Modern slavery is recognised as a category of abuse within our safeguarding policies.

### **Our values**

Our values: Integrity, Trust, Empower, Respect and Care underpin our culture and how we do business. They are embedded throughout our business and set the parameters for how we expect people to behave with their colleagues, service users and the world at large. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

### **Our procedures**

Cygnet have a number of procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains.

### **Employment**

- Robust recruitment processes in line with UK employment laws, including: 'right to work in the UK' document checks; contracts of employment and checks to ensure everyone employed is aged 16 and above.
- Cygnet has a Recruitment, Selection and Appointment of Staff policy which clearly lays out the process for recruitment to ensure robust checks are made throughout the process.
- Market-related pay and reward, which is reviewed annually.
- An enhanced benefits package, providing additional health and welfare options to support our people's (and their families) lifestyle choices.

### **Reporting knowledge or suspicion of slavery**

- Cygnet already have in place an independent whistleblowing line which ensures that anyone who has concerns, for example, about how staff are behaving or to report any suspicions our staff may have regarding modern slavery, has a means of raising their concerns confidentially. Our employees have been signposted to the hotline in our communications.
- Cygnet also has a Freedom to Speak Up policy to ensure that staff feel supported to raise concerns and feel free to speak up without fear of reprisal, and a Freedom to Speak Up Guardian to act as an impartial source of advice to staff at any stage of raising a concern.

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- Cygnet has an Allegations against Persons in a Position of Trust policy which ensures any allegations made against staff are investigated thoroughly and appropriate onward referrals are made to external bodies and regulators.

### **Training**

Modern slavery and trafficking is covered within our safeguarding online training module. All staff complete online introductory safeguarding training, all registered professionals complete intermediate level training, and our Safeguarding Leads at each service complete further advanced training.

### **Governance**

Modern slavery as a form of abuse within safeguarding falls within the safeguarding governance structure. This is headed by the Executive Director of Nursing, who chairs the quarterly Safeguarding Committee. There are regional Safeguarding Forums held quarterly which report into the committee. The Safeguarding Committee reports to the Executive Management Board to ensure any issues are escalated and the Board have sight of these.

### **Procurement and our supply chain**

Cygnet have a broad spectrum of suppliers that we split into a number of categories including, Corporate, Digital Services, Estates and Facilities, Health Care, Social Care and Human Resources.

Each new supplier is carefully vetted to ensure they meet our business requirements, and that they operate in line with our company values. During the onboarding process, each supplier must sign our terms of business, which mandate that all suppliers must comply with anti-slavery and trafficking legislation. If we were to find breaches of these laws within our supply chain, we would immediately report those breaches to the relevant authorities, and cease trading with that supplier.

### **Application of this statement**

This statement applies to UK Acquisitions No. 6 Limited, Cygnet Health Care Limited as the main operating company, and its subsidiaries/legal entities listed below:

Caireach Limited  
CAS Aspirations Properties III Limited CAS  
Aspirations Properties Limited  
CAS Aspirations Properties Limited  
CAS Aspirations Properties V Limited  
CAS Clifton Healthcare Limited  
CAS Healthcare Properties Limited  
CAS Learning Disabilities Services Limited  
CAS St. Paul's Limited  
Cygnet (DH) Limited Cygnet  
(OE) Limited

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Cygnet (DM) LLP  
Cygnet 2000 Limited  
Cygnet 2002 Limited  
Cygnet Aspirations Developments Limited  
Cygnet Behavioural Health Limited  
Cygnet Care Services Limited  
Cygnet Clifton Limited  
Cygnet D Holdings Limited  
Cygnet DHG Limited  
Cygnet Health Care Limited  
Cygnet Health Developments Limited  
Cygnet Health Properties Limited  
Cygnet Health UK Limited  
Cygnet Hospitals Holdings Limited  
Cygnet Inter-Holdings Limited  
Cygnet Learning Disabilities Limited  
Cygnet Learning Disabilities Midlands Limited  
Cygnet (Newton House) Ltd  
Cygnet NW Limited  
Cygnet Propco Holdco II Limited  
Cygnet Propco Holdco Limited  
Cygnet Propco II Limited  
Cygnet Propco Limited  
Cygnet Supported Living Limited  
Cygnet Surrey Limited  
Cygnet Trustees Limited  
Everycorner Limited  
Isand (Domiciliary Care) Limited  
Isand Limited  
Orchard Portman Hospital Limited  
Orchard Portman House Limited  
Relativeto Limited  
Safe Spaces Limited  
Short Ground Limited  
Stac Healthcare Limited  
Taunton Hospital Limited  
UK Acquisitions No. 6 Limited