

Modern slavery and human trafficking statement

FitzRoy Group

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Modern slavery and human trafficking statement

FitzRoy is committed to preventing modern slavery in its charitable activities and supply chains, by taking steps, as far as we are able, to ensure that our supply chains are free from slavery and human trafficking. Modern slavery encompasses slavery, forced labour, human trafficking, and domestic servitude.

This statement sets out the actions and activities that have taken place during the financial year 1 April 2025 and 31 March 2026 to ensure that there is no slavery or human trafficking in our organisation and supply chains.

Our Organisation

The FitzRoy Group

FitzRoy Support is the parent company within the FitzRoy Group, with FitzRoy Support Services Limited as its subsidiary.

FitzRoy provides support to over 850 people and employs around 1730 staff. We transform lives every day, supporting people with disabilities to do the things that make a real difference to their everyday life. We are passionate that people with learning disabilities and autism have choices and get the support they need to fulfil their potential and gain independence. We are driven by seeing people flourish when they connect with their communities, learn, work, volunteer, and enjoy relationships.

We provide support for people with learning disabilities, physical disabilities, and autism, and some of the people we support have additional mental health needs. We provide this support in residential, nursing, supported living, support at home and day care settings.

Our supply chains

Our anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships.

We have a broad range of suppliers and, having reviewed our business, those which we deem to be most at risk from Modern Slavery are providers of agency staff, building, maintenance, cleaning contractors, and IT equipment providers.

We look to source goods and services from organisations that are reputable and where we can check their suitability.

Policies and Control

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 our operations:

Procurement policy - We expect our suppliers to have internal policies relating to and have processes in place to meet the Modern Slavery Act 2015 and we check this during

our supplier due diligence checks. A small supplier who does not have these policies in place will be able to sign up to FitzRoy's policies by contacting the relevant procuring Manager. A supplier without these policies in place will not meet our minimum requirements, and a supplier with policies in place, but identified as not adhering to them may have their contract terminated. All our suppliers will be contacted once every two years, and Modern Slavery policy checks will be part of this.

Whistleblowing policy - FitzRoy encourages all its employees, customers, and other organisation stakeholders to report any concerns related to the direct activities of, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of repercussion. Employees, people we support and their families or others who have concerns can use our confidential helpline.

Employee code of conduct - FitzRoy code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Safeguarding - FitzRoy policy sets out behaviour which could give rise to a safeguarding concern, including Modern Slavery.

Recruitment and selection policy - We operate a robust recruitment policy, including conducting UK eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Due Diligence

Any new suppliers are required to confirm compliance with relevant legislation, including 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 them. All existing contractors policies have been reviewed.

HR and recruitment staff undergo specific FitzRoy investigation training and are responsible for carrying out any investigations and due diligence in relation to known or suspected instances of modern slavery or human trafficking.

Training

To ensure our staff understand the risks of modern slavery and human trafficking within our supply chains and across our organisation, we include modern slavery awareness as part of our safeguarding training. All employees are also signposted to additional reading materials to deepen their understanding.

What we have done in 2025/2026

- Reviewed and updated the Safeguarding, Whistleblowing, Eligibility to Work and Recruitment and Selection policies.
- As part of our Environmental, Social and Governance (ESG) strategy, we have reviewed our modern slavery policy and practices in our baseline audit.
- We provided relevant departments with updated guidance aligned to the incoming Procurement Act 2023, which incorporates provisions aimed at strengthening the UK's stance against modern slavery within public procurement processes.

Looking Ahead & Next Steps

We continue to review our engagement with existing third parties/suppliers to check their policy and processes and ensure they understand our expectations.

We will continue to provide information, training, and support to our staff on modern slavery and human trafficking as appropriate, so they understand the legislation and impact of our activities.

Monitoring, Evaluation & Key Performance Indicators (KPIs)

To strengthen our monitoring and evaluation processes, FitzRoy has introduced measurable Key Performance Indicators (KPIs) aligned with updated UK Government Transparency in Supply Chains guidance (2025). These KPIs allow us to assess our progress, identify gaps, and demonstrate continuous improvement in preventing modern slavery across our organisation and supply chains.

1. Supplier assurance

- 100% of new suppliers to complete modern-slavery due-diligence checks
- 100% of high-risk suppliers reviewed every 12 months

2. Recruitment and right-to-work

- 100% of staff with verified right-to-work documentation
- 100% internal audits of recruitment files

3. Staff training

- 100% completion rate for modern-slavery induction training with FitzRoy's safeguarding training
- Annual refresher completed by 95% of staff

4. Risk assessment

Working for FitzRoy Risk Assessment includes risk, mitigation and control measures and is reviewed annually.

5. Reporting and case management

- All concerns investigated within 10 working days
- Update on concerns, risks, and remediation to be completed in line with annual statement review and approval.

These align closely with strengthened government expectations for monitoring and evaluation, due diligence, and risk management.

Board approval

This statement has been approved by the FitzRoy board, who will review and update it annually.

Signed:

Mark Smith
Chair of FitzRoy Board of Trustees

Date