



The SENAD Group (The “Company”)

Slavery and Human Trafficking Statement

Introduction

Slavery and human trafficking remains a hidden problem in our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns in this area and management are expected to act upon them.

Group Structure

The SENAD Group is an independent operator of special needs schools, transition homes, supported care and community support services for people with a range of learning disabilities and other complex needs.

Our Business

The SENAD Group operates schools in the East Midlands, Herefordshire and Wales and draws students from across the United Kingdom and occasionally from overseas.

The Group also operates care homes and community based transition homes, providing residential care to young adults with severe learning difficulties.

Our community support service supports individuals and their families in their own homes or when they are out in the community.

Specifically, our services are based in Derbyshire, Staffordshire, Herefordshire and Dolgellau, North Wales. We employ in excess of 800 staff across these areas.

The central office team is based in Derby and from here support the Group’s services.

Our annual turnover for the Group and its subsidiaries is in excess of £36m.

Our Supply Chains

Our supply chain includes Local Authorities, Recruitment Agencies, Catering and Domestic Management Services, Maintenance Contractors, Training providers and Medical professionals including therapists and consultants.

We internally review our supply chain to evaluate risks and we conduct audits which review all aspects of the supply chain including but not limited to safety, human trafficking, child labour and other legal requirements - for example regulatory compliance with the DfE and care inspectorates.

Our policies on slavery and human trafficking

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. Our policies reflect our commitment 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 chains.

Our Safeguarding policies include specific guidance for staff on how to recognise signs of abuse, including slavery, human trafficking, forced labour and domestic servitude among our clients and contractors and how to respond to and escalate any concerns.

We are committed to a workforce that is free of harassment and unlawful discrimination, including race, colour, religion, national origin, gender (including pregnancy), age, disability, sexual orientation, gender identity, HIV status, marital status, past or recent military status or any other status protected by the laws and regulations on the locations where we operate.

If a supplier is found to have been involved in modern slavery then we would cease engagement with them.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk –

- We identify and assess potential risk areas in our supply chains.
- Where possible we build long standing relationships with Local Authorities, Recruitment Agencies, Catering and Domestic Management Services, Maintenance Contractors, Training providers and Medical professionals including therapists and consultants and make clear our expectations of business behaviour.
- We conduct background checks on all Catering and Domestic Management Services, Maintenance Contractors, Training providers and Medical professionals including therapists and consultants.
- Without exception we protect whistle blowers and report unethical conduct.

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values and share our zero tolerance approach.

The Group HR Manager is aware of the requirements of the Modern Slavery Act and the principles of human rights. Departmental Managers are responsible for compliance in their respective departments and for their supplier relationships.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide 'tool box' training to relevant members of staff. All Directors have been briefed on the subject.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Effective use of the Recruitment and Selection Policy and Procedure.
- Use of labour monitoring and payroll systems.
- Completion of audits conducted by internal and external auditors, including the Home Office, Ofsted, Estyn, Care Quality Commission and Care and Social Services Inspectorate Wales.
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

This statement is given in English but may be translated into other languages upon request to the Group Human Resources Manager.

Approval and support of this statement is given by the Board of Directors as follows:



Brian Jones
Chief Executive Officer



Richard Atkinson
Finance Director



Dr Mark Flynn
Chief Operations Officer

December 2016