



## **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 within England and Wales, we do not operate any care or education provision outside of the UK.

#### **Our Business**

The SENAD Group operates schools in the East Midlands, Herefordshire and Wales and draws students from across the United Kingdom and very 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. Those who purchase our services are typically UK based, ranging from Local Authorities, Insurers and private fee payers. We employ in excess of 800 staff across these areas, our staff are largely directly employed and are not in any category which may be typically vulnerable to modern slavery in this country, so our focus is to ensure there are policies and procedures in place for contractor and suppliers.

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

#### **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, Insurers and private fee payers (very few).

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 service users 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, medical status, marital status, past or recent military status or any other status protected by the laws and regulations on the locations where we operate. Our specific policies on Bullying & Harassment, Equal Opportunities and Equality & Diversity are clear in this regard.

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 on an individual basis.
- 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 our Employees and Workers, Agency staff, 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 HR Director and Board of Directors are 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 information and guidance 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.
- That our main customer base is the public sector, who have their own responsibilities in this regard.

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 Director.

Approval and support of this statement is given by the Board of Directors and is confirmed and championed by the Group Human Resources Director:



**Victoria Finn**  
**Group Human Resources Director**

**November 2018**