

The SENAD Group

Modern 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 the community, 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 the Midlands, Derbyshire, Staffordshire, Northampton, 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.

We have a clear Whistleblowing (Protected Disclosure) Policy available to all staff and workers and all colleagues are encouraged to report and expose unethical or inappropriate procedures or behaviour.

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. There are specific policy references to and training for relevant staff with regards to 'County Lines' across our Schools and Children's Homes. We engage Designated Safeguarding Leads (DSL's) with enhanced training and specific responsibility around the safeguarding of children in this regard.

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.

We hold a visa sponsorship license with UKVI in order to recruit Care Workers and Senior Care Workers from abroad if required. We take our enhanced commitment and support to this group of staff extremely seriously. Those workers are free to leave or work elsewhere should they wish, they are not tied into any unreasonable visa fee or other travel fee repayment clauses. Rather, the company will do all it can to settle overseas workers into their own accommodation and local communities. We will not make any unreasonable deductions from pay, we provide the full contractual hours as agreed, overtime is entirely voluntary and workers are encouraged to speak to their Line Manager or HR Officer if they have any concerns at all with their visa, settlement or work in the UK.

If a supplier is found to have been involved in modern slavery or the ill treatment of overseas workers 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.
- If recruiting directly from overseas, we use a well trusted agent / recruitment agency and recruitment fees are not charged or passed on to the employee.
- We carry out regular payroll reporting to ensure no worker is paid below the minimum wage.
- 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 other Board 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 Inspectorate Wales.
- Annual financial audit and reporting.
- 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 for financial year end 31st August 2023 and 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

February 2024

Useful resources:

Internal

Site Specific Safeguarding Policy & Procedures

Recruitment & Selection Policy & Procedure
Equal Opportunities Policy
Confidential Disclosures (Whistleblowing) Policy & Procedure
Disclosure & Barring Service Code of Practice

See SharePoint for all policy information for colleagues

External

National Modern Slavery & Exploitation Helpline – 08000 121 700

Police 101 / 999 for those in immediate danger

www.nationalcrimeagency.gov.uk

www.ceop.police.uk

[Unseen – Anti Slavery Charity \(unseenuk.org\)](http://unseenuk.org)