

The SENAD Group

Modern Slavery and Human Trafficking Statement

Introduction

Modern slavery “refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power” (International Labour Organisation).

Slavery, forced labour 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, and have a responsibility to act upon them.

Group Structure

The SENAD Group is an independent operator of special needs schools, care 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.

This statement is given for SENAD Investments Ltd and includes its subsidiary companies, specifically: SENAD Ltd, Rowden House School Ltd, Winslow Court Ltd, SENAD Community Ltd and Aran Hall School Ltd.

Our Business

The SENAD Group operates schools in the East Midlands, Northampton, 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 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 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 not employ children on a permanent or temporary basis.

We have a clear and detailed 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. We have a Grievance Procedure should staff or workers wish to use this avenue to raise a concern, in addition to regular Staff Surveys. Policies are regularly updated and reviewed and are accessible via central SharePoint facility.

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, Sexual 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 who have travelled to work in the UK under a Skilled Worker Visa. 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.

The same principals of freedom of movement, prohibition of compulsory overtime and freedoms to terminate employment apply to every staff member and worker across the Group.

We will never keep or confiscate staff or a worker's original identification documents. Where a Recruitment Agency has done this, or tried to do this, it should be reported to the HR Director immediately.

If a supplier is found to have been involved in modern slavery, the ill treatment of overseas workers or any staff we have engaged, then we would cease all contracts 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.
- We will audit our own payroll systems for bank account and shared home address irregularities.
- If recruiting directly from overseas, we use a well trusted agent / recruitment agency who are on the Ethical Recruiters List and have their own robust anti-slavery policy and commitment.
- 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. All senior managers and HR colleagues should be aware of and look out for the key warning signs that modern slavery may be taking place – please see Appendix 1.

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 immigration specialists, 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 2025 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

March 2026

Useful resources:

Internal

Appendix 1 – Warning Signs (for all Senior Managers to read)
Site Specific Safeguarding Policy & Procedures
Recruitment & Selection Policy & Procedure
Equal Opportunities Policy
Confidential Disclosures (Whistleblowing) Policy & Procedure
Disclosure & Barring Service Code of Practice
Immigration Compliance Policy
Grievance Procedure

See SharePoint for all policy information for colleagues

External

National Modern Slavery & Exploitation Helpline – 0800 0121 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)

Appendix 1

Modern Slavery Warning Signs

Following a BBC investigation into a food supplier in the UK and based on advice from the National Crime Agency and Crimestoppers; employers, HR staff and line managers should be vigilant for these typical signs of modern slavery:

- Shared bank account details or wages going into a third-party bank account
- Excessive overtime, long shift work without going home
- Appearing to be under someone else's control (needing to ask permission from someone else before working / not working a shift or moving to a new role or department)
- Regularly being dropped off and collected from work very early in the day or late at night or only ever travelling in a group
- Multiple employees sharing the same home address (we monitor this annually)
- Often being in the same clothes, wearing unsuitable clothing for the work or weather, looking unkempt or having poor hygiene
- Signs of physical harm, looking distressed or malnourished or appearing withdrawn and interacting little with others
- A reluctance to seek medical help
- Difficulties in speaking or writing in English that contradict the recruitment process (did someone else complete the application form or respond to any telephone interview)
- More likely to present a fake or borrowed passport or other fake ID documents during the recruitment process.

HR teams are trained in document fraud – all ID checks should go through them. Document fraud can be reported to the Home Office – 0300 790 6268. However, if you suspect the person has been trafficked or in any way is being controlled by someone else, it is better to ring the Modern Slavery Helpline – 0800 0121 700 or visit www.modernslaveryhelpline.org for help and advice.

If you have any concerns whatsoever in relation to items mentioned in this Statement and Appendix, speak to a HR colleague immediately.