

Document ID ref	CA0069
Policy Name	Modern Slavery
First issue date	September 2020
Review date	August 2024
New version date	August 2024
New review date	August 2025
New version ref	V4
Summary of changes	Full Policy Review

CONTENTS

1. Company
2. Organisational Structure
3. Definitions
4. Commitment
5. Supply Chains
6. Potential Exposure
7. Due Diligence Processes
8. Training
9. Policies
10. Monitoring Arrangements

Company

This statement applies to The Esland Group (referred to in this statement as ‘the Company’).

Organisational Structure

The Company provides trauma informed, therapeutic services, helping children and young people gain stability, develop resilience, and facilitate transition.

With over 35 years residential childcare experience, the Company has residential children’s homes, schools (including outreach education provision) spread across Kent, Hertfordshire, Yorkshire, Derbyshire, Lincolnshire, Staffordshire, Wiltshire, Bedfordshire, and Northamptonshire regions in England.

Definitions

The Company considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity, or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Company does not enter into business with any other Company, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in England.

Supply chains

Our supply chains include procurement of agency staff, medical consumables, facilities maintenance, utilities, and waste management.

Potential exposure

In general, the Company considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any Company that supplies goods and/or services to it.

Due Diligence Processes

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners.

The Company has not, to its knowledge, conducted any business with another Company which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Company has taken the following steps to ensure that modern slavery is not taking place:

- reviewing your supplier contracts to include termination powers if the supplier is, or is suspected, to be involved in modern slavery
- measures in place to identify and assess the potential risks in its supply chains
- any actions taken to embed a zero-tolerance policy towards modern slavery
- any training provided to staff on modern slavery.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, our company induction includes guidance on both recognising and reporting modern slavery and human trafficking.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing policy** - the Company encourages all its workers, customers, and other business partners to report any concerns related to its direct activities or its supply chains.
- **Employee Code of Conduct** - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.

- **Environmental, Social and Corporate Governance Policy** - The Company's ESG policy summarises how we work responsibly with suppliers and local communities.

Monitoring Arrangements

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Company's Senior Leadership Team endorses this policy statement and is fully committed to its implementation.