



# Modern Slavery Statement

## Organisation

This statement applies to New Directions Group of Companies (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2018/19.

## Organisational structure

The Group consists of the provision of recruitment services to the professional services sector, together with care agency provision across the UK. We are part of the New Directions Group of Companies with our head office in Cardiff, South Wales headed up by an owner Chairman and Senior Management Team. We employ around 200 core staff and 1400 workers nationally and operate throughout the UK

We have offices throughout Wales and England to include Head Office in Cardiff, with further branches in Swansea, Abertillery, Aberystwyth, Crosshands, Wrexham, Bristol and Wirral.

The Group of Companies consist of recruitment, training, care and support and demand for our service is consistently high throughout the year and is therefore not seasonal.

The labour supplied to the Organisation in pursuance of its operation is carried out across the geographical locations of all New Directions' office. i.e. Wales and North West and South West Regions of England.

## Definitions

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

The Organisation does not enter into business with any other organisation, 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 Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

## Key Suppliers and Chains

To fulfil its activities, the main suppliers of the Organisation include those related to supply of candidates and goods from various suppliers in the United Kingdom.

- » Technology services
- » Financial administration
- » Pensions administration services
- » Local Authorities
- » National Procurement Service
- » Education Workforce Council
- » Teaching Regulation Agency
- » Regulatory Care Bodies for England & Wales
- » Premises management

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist with its material suppliers because some products may involve the provision of labour in a country where protection against breaches of human rights may be limited i.e. China. We do expect our suppliers to have robust policies and procedures in place to ensure compliance with the Modern Slavery Act 2015.

In general, the Organisation considers its exposure to slavery/human trafficking to be limited.

## Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not conducted any business with another organisation which has been found to have involved itself with modern slavery.

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

The above should include steps relating to:

Training all staff to embed a zero tolerance policy towards modern slavery.

Right to work checks completed at recruitment stage;

- » Ensure minimum employment age adhered to, in line with the relevant legislation;
- » Always apply national minimum wage thresholds, in line with the relevant legislation;
- » Regular contact with material suppliers including their understanding of, and compliance with, our expectations.
- » We limit the geographical scope of our operations to the UK
- » Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour.
- » With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- » We have systems in place to encourage the reporting of concerns and the protection of whistle blowers.

## Policies

The Organisation has the following policies which further define its stance on modern slavery A Modern Slavery Policy; Whistle Blowing Policy, Ethical Business Practice Policy, Bribery Act Policy; Recruitment Policy.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

Date of approval: 25.01.18

Signed: 

Print name: S. Cecil

Job Title: Group HR Director

Date: 26.01.18