



### **Our business and structure**

This statement is applicable to all Companies within the New Directions Group of Companies. Where the statement makes reference to the 'Organisation', this is applicable to all Companies within the New Directions Group of Companies.

The Organisation provides UK wide services (including recruitment, training, care provision and other support services) within education, social care, domiciliary care and the pharmaceutical sector, from a network of offices across the UK. The head office is located in Cardiff. The nature of the services which are provided are not subject to seasonal fluctuations and therefore remain largely consistent throughout the year, with the exception of education where activity does naturally decrease during the school holiday periods.

### **Our commitment**

The Organisation has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. The Organisation also expects the same high standards from all its suppliers, contractors, and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

### **Our supply chains**

The Organisation procures the services of certain UK based suppliers to provide a range of goods and services to assist the Organisation's business. This includes but is not limited to IT and other professional services (such as legal and accountancy), sundry office supplies and office cleaning services.

The Organisation expects that each supplier complies with relevant legislation, and we will take all reasonable steps to ensure that modern slavery and human trafficking is not taking place in our supply chains. We do however acknowledge that we do not control the conduct of individuals and organisations in our supply chains.

### **Our policies**

All employees are required to familiarise themselves with the Organisation's policies and procedures which are in place to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to our policies forms part of all employees' obligations under their contract of employment.



The following policies are in place within the Organisation:

Anti-bribery policy  
Anti-slavery and human-trafficking policy  
Dignity at work policy  
Equal opportunities policy  
Grievance policy  
Health & safety policy  
Recruitment policy  
Whistleblowing policy

All policies are reviewed on an annual basis or as necessary, dependent on legislative updates or operational and Organisation policy changes.

### **Measures**

In order to mitigate and manage any risk exposure, the following measures have been taken:

- Anti-slavery and human-trafficking policy has been reviewed and revised to ensure that it remains fit for purpose
- All employees are required to read all relevant policies
- All new employees are required to complete modern slavery training as part of their induction
- Existing employees are required to complete regular, refresher modern slavery training
- The Organisation ensures appropriate due diligence processes are in place both internally and within supply chains to prevent modern slavery
- The Organisation has not conducted any business with any other organisation which has been found to be associated with modern slavery
- Full compliance with eligibility to work checks
- Full compliance with NMW legislation
- The geographical scope of our operations is limited to the UK
- Employees are made aware of the ability to contact the government's Modern Slavery Helpline on 0800 0121 700
- Internal systems are in place to facilitate any reporting of concerns, with subsequent protection for any whistle blowers provided

### **Modern Slavery Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Organisation's slavery and human trafficking statement for the financial year ending 31 March 2023. This statement was approved by the Senior Management Team on 29 March 2022.