



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

August 2024

Next Review Date: August 2025

Introduction

Kedleston Group's mission is to develop confident and capable young people by meeting their educational, health and social care needs in structured, nurturing school and home provisions.

At Kedleston Group we are committed to continuously improving our practices to ensure that modern slavery and human trafficking are not present within our own organisation or our supply chains. We strive to act ethically and with integrity in all our activities.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Kedleston Group's modern slavery transparency statement as at August 2024.

This statement explains the steps that have been taken by Kedleston Group to date and how we plan to continue developing and implementing a proactive approach to the prevention of modern slavery and human trafficking.

This statement covers the activities of all companies which form part of Kedleston Group.

- Kedleston Schools Ltd - company number 05779536
- Kedleston Schools (London) Ltd - company number 06494539
- Kedleston (Brookways School) Limited – company number 10567342
- Kedleston (Wings Education) Ltd - company number 04627039
- Kedleston (OS Education) Ltd - company number 02120010
- Kedleston (Olsen House) Ltd - company number 07008349
- Kedleston (High Peak School) Ltd - company number 8871805
- Kedleston (Wood Grove Childcare) Limited - company number 00966484

Organisational Structure

Kedleston Group operates within education and social care. We are an independent provider of specialist residential schooling, specialist day schools and children's homes across England for children and young people with autism and social, emotional and mental health needs. Kedleston

Group has circa 800 employees and is comprised of one residential school, thirteen day schools and seven children's homes, in various locations throughout England.

Contractual governance and operational delivery is maintained through corporate teams attached to our head office in London and in regional teams across England where our services are offered. These teams report directly into the COO. All teams report ultimately into the Executive team, headed by the CEO, who has oversight of compliance with all legislation including the Modern Slavery Act 2015 (the Act). The CEO and Executive team report to the board who bear ultimate legal responsibility for the Group's activity.

Kedleston Group uses a number of suppliers to support its operations and activities. Our suppliers are UK based and are therefore required to be compliant with UK legislation. These suppliers mostly provide services relating to marketing, recruitment, venues and events, IT hardware, offices, agency workers, consultants, training, building contractors and materials and professional services. We also procure goods in the form of office supplies, furniture and other materials and equipment used in our day to day operations.

Our Supply Chains

Kedleston Group is committed to ensuring that our supply chains remain free of slavery and has implemented a number of measures to help achieve this, including:

- Periodic supplier audits to ensure compliance with the Act.
- Awareness raising with employees who procure goods.
- The corporate team continues to drive the use of best practice in procurement and supply chain management.
- Periodic reviews of procurement processes.

When recruiting temporary workers, we utilise the services of specialist recruitment suppliers, all of whom are reputable agencies and with whom we have agreed Terms and Conditions for each appointment. These suppliers and terms are reviewed periodically. To minimise any risk we have taken the following steps to ensure that such recruitment complies with the Act:

- Our agreements ensure that suppliers provide the necessary 'right to work' checks for all temporary staff.
- Our agreements ensure that we are fully compliant with agency worker regulations.
- Safer Recruitment policies are implemented and followed.

Policies and Processes

Kedleston Group is committed to continued policy development to ensure that we keep up to date with all changes in legislation, including full compliance with the Modern Slavery Act.

We have a wide policy framework that supports the aims of the Modern Slavery Act:

- Child Protection and Safeguarding
- Whistleblowing Policy
- Grievance Policy
- Recruitment & Selection Policy
- Pay Policy
- Anti-bullying policy
- Code of Conduct for staff
- Equality & Diversity Policy
- Compliments and Complaints Policy

Due Diligence and Risk Management

Kedleston Group operates a robust approach to governance to ensure we are transparent and accountable for continually reviewing and improving the quality of our schools and homes. We have developed a comprehensive system to keep corporate governance under regular review.

All our schools and homes are required to hold a full governance meeting on a termly basis which is led by the Principal, Headteacher or Home Manager and always includes members of the Kedleston senior leadership team including the Chief Executive and/or the Chief Operating Officer. On occasions the governance meetings will also be attended by one of the company's non-executive directors.

A sub-committee (the Quality Assurance and Compliance Committee) of the board of directors of Kedleston Group Ltd meets termly to monitor, review and evaluate systems and trends. Corporate Governance issues are regularly reported to and reviewed with the board.

The Group Safeguarding Lead reports directly to the Safeguarding Overview Committee (SOC) which is a sub-committee of the Board of Directors of Kedleston Group. The Committee comprises three non-executive directors, the CEO, the COO, the Group Safeguarding Lead, and the SOC Secretary. The Committee reviews all safeguarding matters, as well as trends and will issue requirements or recommendations in respect of any concerns. The Committee meets monthly and reports to the Board at each Board meeting.

Each of our provisions undergoes regular audits with the relevant corporate team leads for health and safety, safeguarding, HR, care and education to ensure compliance with policy and best practice. In addition, each of our settings are subject to inspections by regulatory authorities, for example Ofsted.

Our recruitment processes are set out in our Recruitment & Selection Policy and we ensure that all prospective employees are legally entitled to work in the UK. All employees are required to undergo a disclosure and barring check at the appropriate level for their role in addition to a range of other pre-employment checks, including references, criminal records self-disclosure and online searches.

Kedleston Group reviews use of its in house payroll to ensure our employee salaries are above the national living wage.

As part of the procurement and contracting process with all key sub-contractors and suppliers, Kedleston Group carries out detailed financial and legal due diligence checks for all large supply arrangements.

The Group also carries out risk assessments for projects that are managed by the company; this includes risk management measures such as contract risk registers and cross-functional team steering groups to ensure contract and risk oversight of all the programmes. These are constantly reviewed by senior management to ensure their continued effectiveness in managing any risk. Due to the nature of the sector that Kedleston Group operates in, and the close regulation and supervision it receives from UK Governmental departments, the likelihood of compliance risks occurring is very low.

Culture and Training

This statement is shared with all employees and it is included in induction processes for new employees.

The ethical and moral culture that Kedleston Group promotes is part of every employee's training from their initial induction until they leave the organisation. All employees are required to complete mandatory child safeguarding and equality, diversity and inclusion training every two years. Other mandatory training includes child sexual exploitation, county lines, modern slavery and human trafficking, safer recruitment, GDPR, equality and diversity.

Throughout the year, various additional learning events and other activities take place to raise awareness with both employees and pupils/students; for example, training sessions delivered by an external specialist on topics such as County Lines, Child Sexual Exploitation, lessons embedded in the curriculum.

To ensure alignment with our mission, we require that every prospective candidate can demonstrate their belief in our values as part of our recruitment process. This culture ensures that employees feel confident in flagging any failings that they may encounter while working for the organisation, including the Modern Slavery Act. Our Whistleblowing Policy further encourages staff to report concerns in the workplace.

Incidents

To date, there have been no reported incidents of modern slavery by Kedleston Group or suppliers to Kedleston Group in 2024.

Planned activities

Over the next 12 months we will continue to build on the work already done to further develop our anti-modern slavery policies and procedures. Planned activities include:

- Continuously updating our procurement processes and key policies across the Group.
- Refreshing specific Modern Slavery Act training to key individuals and teams across the organisation.

- Awareness raising across the wider organisation via internal communication channels and our website.
- Launch of a Supplier Code of Conduct for use in our tendering and contracting processes.
- Annual contract review.

Approval

This statement was approved by the Board on 31 August 2024 and is signed by Lee Reed, Chief Operating Officer, Kedleston Group.

Signed:

A handwritten signature in black ink, appearing to be 'Lee Reed', is centered on a light gray rectangular background.