

The Cambian Group's Modern Slavery Statement

This statement is made on behalf of the board of the Cambian Group ("Cambian") with regards to the Modern Slavery Act 2015, which requires large employers to be transparent about their efforts to eradicate Slavery and Human Trafficking in their supply chain. This statement covers the activities of all the companies within the Cambian Group for the financial year ended 30 September 2018.

The Cambian Group is one of the UK's leading children's specialist education and behavioural health service providers. Founded in 2004, it has grown to become a significant partner to the UK public sector. The Group's services have a specific focus on children who present high severity needs with challenging behaviours and complex care requirements. Cambian looks after 2,100 children and employs over 4,000 people across a portfolio of 224 residential facilities, specialist schools and fostering offices located in England and Wales. We offer a differentiated and integrated education and care model focusing on children with high severity needs across three divisions: specialist education, residential care and fostering.

Cambian has a zero-tolerance approach to modern slavery, human trafficking and child labour. 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.

All Cambian services are subject to rigorous operational statutory regulation with compliance measured and audited by Ofsted (England), Care Quality Commission (England), and Healthcare Inspectorate (Wales). To maintain a focus on quality, Cambian operates an internal quality assurance cycle together with a regular external and independent review of the quality of our services.

The key component in all our businesses are the people employed to support our operations. Due to the nature of children's services, our recruitment processes are strict and comply fully with regulatory guidelines and safer recruitment for those working with children. Our teams are encouraged to speak up about unethical behaviour, wrong doing or behaviours they think go against our policies and values. We operate an independent whistleblowing service which is accessible to our service users and their families, our staff and external contractors. There is a potential for low risk in the supply chains in the provision of agency staff.

We buy a wide range of external goods and services, including food and catering supplies, leisure activities, general household supplies, stationery, electronics. A large proportion of goods and services is bought through regional suppliers, however the principle of Best Value is applied taking into account cost, regulatory requirements / product standards and fitness for purpose. In terms of our administration, IT and management of our facilities and buildings, our supply chain is rationalised where possible, and our procurement and property team have oversight where appropriate.

It is expected that our suppliers are able to provide details of their own policies supporting their statements and, as a minimum, meet national laws and include human rights principles regarding child labour or bonded or forced labour where documents are withheld, payment of fair wages and payment in money, not kind. We expect our suppliers to fulfil their obligations to comply with the provisions of the Modern Slavery Act.

Our Anti-slavery Statement reflects 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.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Whistleblowing Policy:** aimed principally at our employees but also available to others performing functions in relation to the Company, such as agency workers and contractors. All concerns can be reported through this procedure which extends to human rights violations including modern slavery. All reports will be fully investigated and appropriate remedial action taken. In addition to the policy, the Company carries out workshops with staff so that they understand their obligations with regard to flagging concerns via Cambian's whistleblowing process.
- **Child Protection and Safeguarding Policy:** the policy provides staff and volunteers with the guidance they need in order to keep all individuals safe and secure in any of our settings. It defines modern day slavery as a safeguarding risk faced by young people in our care and outlines our staff's responsibilities in recognizing and responding to this.
- **Children at Risk of Child Sexual Exploitation:** the policy is in place to ensure that all children and young people are protected from harm and exploitation and that their welfare is promoted. It ensures that staff are able to understand their individual duty of care, be accountable and ensure all Legislative Requirements are met.
- **Grievance Policy:** This is aimed at receiving grievances or concerns about our care provision or conduct. All of these will be fully investigated and appropriate remedial actions taken. Additionally we work closely with our social care and health partners ensuring our safeguarding policies and procedures dovetail with local procedures and best practice.
- **Complaints Policy:** Cambian takes all complaints and comments seriously. It aims to promote an open culture and will be responsive where such issues are raised, in a transparent and robust manner. Cambian fully supports an individual's right to refer any complaint, at any stage to an external body. In addition, all sites receive an independent visitor who on a monthly basis and some operate a link advocate; both of whom can support individuals who wish to make complaints. Contact details for both the independent visitor and advocate are made available to all service users.
- **Policy and Procedure for Independent Visitors:** the purpose is to provide opportunities for individuals, parents/carers and staff to meet or contact the Independent visitors and discuss any safeguarding, welfare or other concerns relating to individuals. This again adds an additional element of safeguarding.
- **Recruitment Policy:** including conducting eligibility to work in the UK checks for all employees to safeguard.
- **Use of Overtime, Relief and Agency Staff Policy:** we expect that all agencies which supply Cambian ensure that staff are screened and vetted in line with best practice and relevant legislation to ensure authentic and legal documentation, right to work in the UK and identity, as well as assessing for any concerning behaviours/fears/pay or banking irregularities or health issues that may require further review in line with combating Modern Slavery.

- Anti-Bribery and Corruption Policy: it is our policy to conduct all of our business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.
- The Procurement Policy: Compliance with this policy enables staff to maintain proper standards of fairness, probity and integrity in business relationships with all suppliers and sub-contractors. It is viewed in conjunction with the Company's Procurement Code of Conduct.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

The Company confirms that prior to any supplier being included on our supply chain they have policies and procedures that are congruent with our intention to combat slavery and human trafficking.

If suppliers do not have their own Modern Slavery statement/policy, we will make our statement available and obtain assurances of the supplier's commitment to follow prior to supply commencing. If, after supply commences, we believe there is an actual breach or risk of breach, we will investigate this following our Complaints and/or Serious Untoward Incident Policy.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, our employees are encouraged to identify and report any potential breaches of our anti-slavery policy and we have in place protection for whistle blowers.

Direct Communication

The Company encourages members of the public or people not employed by us to write, in confidence, to the Company's Chief Operating Officer to raise any concern, issue or suspicion of modern slavery in any part of our business.

We will know the effectiveness of the steps that we are taking to ensure that slavery is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies or local safeguarding teams to indicate that modern slavery practices have been identified.

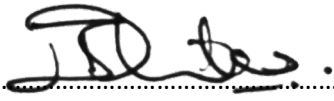
Safeguards

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this statement, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual. Staff are hereby informed of the Modern Slavery Helpline on 0800 0121 700 in accordance with the training recommendations of "Transparency in Supply Chains etc. A practical guide" (Guidance issued under section 54(9) of the Modern Slavery Act 2015).

Approval

This statement has been formally approved by the directors of the Cambian Group and signed on their behalf.

Signed on behalf of Cambian Group Limited

..... April 2019

Jeremy Wiles

Group Business Development Director