

Modern Slavery Statement for financial year 2018/19

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that CSN Care Group Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Company has a zero -tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

We provide domiciliary care services to individuals living in their own home. We have a network of some 22 Branches and operate across England and Scotland where our services are commissioned through local authority and health partners, or privately with individuals. CSN Care Group Ltd trades as Carewatch, New Directions Care and Support, My Life Living Assistance and My Life Specialist Care. Each operates to the same underpinning policies and processes.

CSN Care Group Ltd became a registered entity in January 2019 and acquired the assets, policies and processes that were previously under the management of Carewatch Care Services Ltd. This statement is therefore based upon the inherited position for this financial year.

Our high risk areas

We have a governance structure that review and manages the key risks to our business. With regard to Modern Slavery, our key risks areas are identified as :

- Recruitment. This risk is mitigated by:
 - Safe recruitment standards consistent with sector requirements
 - Criminal Record Checks
 - Identify Checks
 - Right to Work Checks
 - Supporting policies, procedures and training

- Suppliers: This is mitigated by:
 - Approved provider process
 - Contractual terms
 - Trusted suppliers

Our policies

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

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers

We operate a supplier policy and maintain a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may terminate the contract at any time should any instances of modern slavery come to light]

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors on 13th February 2019

Signature



Craig Hendry, Managing Director

13th February 2019