

## **Witherslack Group LTD Modern Slavery Statement - Year ended 31 August 2024**

This statement is made in accordance with section 54(1) of the Act and sets out The Witherslack Group's human trafficking and slavery statement for the Group financial year ending 31st August 2024.

The Witherslack Group is the UK's leading education provider for children and young people with special educational needs as evidenced by sector leading Ofsted judgements, unmatched placement stability, school attendance and outcomes for young people.

We seek to conduct our business with the utmost integrity and highest ethical standards. We strongly oppose any form of modern slavery activity within our business and supply chain and are fully committed to playing our part in helping eradicate it. We believe that working collaboratively with our suppliers and other organisations to build knowledge and engagement will not only benefit their own operations but also play a vital part in preventing modern slavery.

Witherslack Group supplier contracts emphasise, where relevant, the requirement for compliance with the Modern Slavery Act 2015. Specific actions we have implemented in 2024 to reduce the risk of modern slavery in our supply chain and support our approach to responsible procurement include further enhancements to our procurement arrangements through developing a new policy and a new code of conduct along with new terms and conditions for all suppliers. This will ensure that our suppliers continue to adhere to the highest standards.

Our Focus for 2025 includes further supplier consolidation and focus on robust contracts with the expectation of suppliers adhering to our standard terms including those relating to Modern Slavery. We will also be working with suppliers to ensure they evidence their adherence to our policies.

We are committed to achieving and maintaining the highest standards of professional and ethical conduct amongst all colleagues. Witherslack Group has a suite of policies and procedures available to all colleagues in the company that help us to mitigate the risk of modern slavery. These include but are not limited to the Code of Conduct, Anti-Bribery and Corruption Policy, the Bullying and Harassment Policy, the Equality and Diversity Policy and the Disciplinary Policy.

We have a clear and rigorous Whistleblowing (Protected Disclosure) policy and our Whistleblowing line is managed by a third party to ensure confidentiality. All colleagues are encouraged to report and expose unethical or inappropriate procedures, practice, or behaviour. We aim to ensure that all members of our community feel safe in the

knowledge that they can voice any concerns in confidence and that they will be taken seriously and dealt with appropriately.

As a provider of services to children in a highly regulated sector, our pre-employment and recruitment checks are particularly rigorous. These include comprehensive checks of an applicant's employment history, right to work in the UK and suitability to work with children. All supply agencies we choose to partner with are required to comply with the same statutory safeguarding checks. We monitor and audit our recruitment processes and we continually develop all areas of our training as part of our overall continuous improvement efforts.

We have a robust pay framework which ensures compliance with the National Minimum Wage. We also request that our suppliers are compliant with the National Minimum Wage.

Our due diligence processes are constantly developing through our corporate governance which includes assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed. Our actions will be proportionate to the level of risk we identify.

As an organisation that provides education and care to some of the most vulnerable members of society we understand and take seriously the importance of removing slavery and human trafficking from society and we are committed to this aim.

Signed on behalf of The Witherslack Group

A handwritten signature in black ink, appearing to read 'T. Fletcher-Ray', with a stylized flourish at the end.

Tracey Fletcher-Ray

Chief Executive Officer