

## About us

Avenues is a specialist provider of support services for people with autism, learning disability and acquired brain injury with 1885 staff supporting around 633 people across our subsidiaries in the South, South East, West Midlands, London and East of England.

Avenues is committed to excluding the existence or prospect of modern day slavery within the whole Group and its supply chain. We work to the highest professional standards and comply with all laws, regulations and rules relevant to our organisation and we expect the same from our suppliers. Our supply chain includes the following:

- IT and communications
- Building, maintenance, utilities and cleaning
- Marketing and media
- Employment, staffing and recruitment – including training provision and occupational health
- Legal, financial and specialist practice support

We are committed to only working with organisations that share our values and work ethically and with integrity. We take a zero tolerance approach to modern slavery practices and will not engage with any organisation which knowingly supports or is found to be involved in slavery, forced or compulsory labour.

## Our approach

Our core values underpin a range of policies that contribute to our strong culture of Fairness, Respect, Equality, Diversity, Inclusion and Engagement which in turn are reflected in our Equality of Opportunity, Dignity at Work and Anti Bullying and Harassment Policies.

As a result, we have an open and non-discriminatory culture that enables individuals to raise concerns about wrongdoing including breaches of the law or regulations, without fear of reprisals including disciplinary action. This approach is reinforced by our Whistle Blowing Policy and Procedure. The Whistleblowing procedure is operated by an independent party ensuring that concerns can be raised entirely confidentially. External stakeholders can raise their concerns via our Complaints Procedure.

We operate a robust recruitment and people management process, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or forced labour. We do not employ anyone under the age for completion of compulsory education.

All of our employees are paid at least the National Living Wage and in relation to temporary staff provided via neutral vendor model, we have full visibility of charging structures and can be confident that workers are in receipt of at least the National Living Wage.

All of our operational workforce complete Safeguarding Training every 2 years and this includes a module dedicated to Modern Slavery Awareness. This is further

supported by our Safeguarding Policy, which sets out our definitions of abuse inclusive of modern slavery.

We support the wellbeing of our workforce and their families through a variety of initiatives, which includes access to an independent, free and confidential telephone advisory service through which victims of modern slavery can seek legal and emotional support for their situation.

We only use reputable agencies for the provision of temporary and permanent staff via a neutral vendor who operate stringent vetting of the agencies that they supply on our behalf. We undertake spot checks on other agencies for the same purpose.

### **Actions to date**

#### **We have:**

- continued our current procedures; monitoring supplier information and practices to ensure that we only work with suppliers who are ethical and operate with integrity
- continued to use our code of conduct to communicate the standards expected of suppliers.
- developed and launched a procurement policy; strengthening our commitment to the eradication of modern slavery whilst introducing new procedures for the onboarding of suppliers.
- formed a partnership with a Neutral Vendor provider of agency staff and have now embedded this organisation wide. The neutral vendor undertakes stringent checks on all agency partners on behalf of the end user. at the onboarding stage.
- raised awareness of the nature and impact of Modern Slavery across our workforce.
- Embedded clear protocols for the introduction of off payroll workers including IR35 assessments which lead to more scrutiny of umbrella companies which can present a greater Modern Slavery risk,
- continued with our robust right to work checks, to identify any evidence of human trafficking, particularly having become a licenced sponsor under the Skilled Worker immigration route in August 2023
- recognised the strategic risk posed by modern slavery and included a risk along with controls on our risk register, ensuring visibility at both board and executive level
- reduced the number of staff vacancies by 50% since the publication of the last statement. This in turn has reduced our reliance on the temporary workforce where we recognise is the greatest risk of modern slavery for our organisation.

### **Our commitment**

#### **We will:**

- Partner with Unseen UK from October 2024 to raise the profile of the risk of Modern Slavery in social care and specifically to establish:
  - Where we can strengthen our commitment to the eradication of Modern Slavery

- Train and develop key members of our workforce
- Develop a slavery officer role to ensure sufficient in-house knowledge of the risks of and solutions to preventing modern slavery from infiltrating our organisation.

Our partnership with Unseen UK will dictate the details of the actions we will take over the coming year.

- Work with our Neutral Vendor to ensure that every one of our agencies is audited over the coming 12 months for their compliance with a range of criteria including practices that eradicate modern slavery.