

MODERN SLAVERY STATEMENT - 2024/25

THE AVENUES GROUP

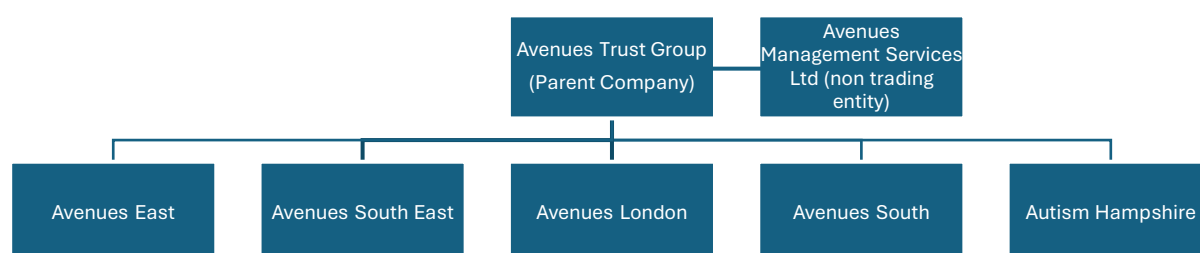
Declaration

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by the Avenues Group on behalf of its subsidiaries Avenues London, Avenues East, Avenues South East, Avenues South and Autism Hampshire for the financial year ending 5 April 2025 to prevent modern slavery and human trafficking in its own business operations and supply chains.

About us

The Avenues Group operates in the health and social care sector which is a high risk area. Avenues is a specialist provider of support services for people with autism, learning disability and acquired brain injury with 1905 staff supporting around 769 people.

This statement covers the Avenues Group and the following subsidiaries: Avenues London, Avenues East, Avenues South, Avenues South East and Autism Hampshire. Our Modern Slavery strategy is developed centrally on behalf of all subsidiaries.



Our commitment

Avenues is committed to combatting and eradicating modern slavery within our operations and supply chains. We have an established zero tolerance approach with oversight of the risks and mitigations visible at all levels of our organisation including the board of trustees. Avenues continues to assess areas of high risk and develop due diligence processes to reduce the risk of modern slavery infiltrating our organisation through key supply chains. Modern slavery awareness is raised through training and a dedicated intranet page containing briefings and reporting lines. We have developed policies and practices to help prevent, identify and address instances of slavery, forced labour and trafficking within our operations and supply chains.

Avenues is committed to the legal and ethical case for the eradication of modern slavery but moreover our approach to combatting modern slavery is aligned with our organisation values of Respect, Integrity, Pride and Excellence. We have high expectations of our workforce and engender a culture of pride and excellence in our work for the benefit of the Avenues community and the people that the organisation supports. We respect the human rights of our workforce and the workforce of our partners and supply chains and demonstrate this through robust worker welfare practices. Integrity – doing the right thing, not the easy thing – is a value that routinely runs through our decisions and practices and ensures we make difficult decisions when its right to do so.

Key focus areas in 2024/25:

- Partnered with Unseen UK to raise the profile of the risk of modern slavery in Avenues resulting in the planning of training from modern slavery experts, a review of key processes and policies to identify potential gaps in Avenues approach and tackling risk.
- Strengthened our organisational commitment to the eradication of modern slavery
- Developed a slavery officer role to ensure sufficient in-house knowledge of the risks of and solutions to preventing modern slavery from infiltrating our organisation
- Worked with our neutral vendor to ensure that every one of our agencies was audited in the last 12 months for their compliance with a range of criteria relating to their worker welfare practices.
- Undertook a detailed risk assessment and identified controls relating to temporary labour supply as identified in the Unseen Gap Analysis.
- Developed and documented a process that ensures we review the temporary labour provider list twice yearly, removing poor performing or underutilised agencies to ensure we are well placed to build excellent quality relationships with those remaining
- Developed and documented a process to ensure the swift removal of agencies that significantly fail audits or to work with them to make improvements (audit score dependent)
- Introduced twice yearly bank account checks, same address, and phone number checks for Avenues employees.
- Developed the Whistleblowing Policy:
 - to clearly communicate that translation services are available via the whistleblowing line.
 - to reflect some examples of modern slavery issues that can be reported
 - to ensure the 'public interest' wording does not deter complaints of exploitation.
 - to ensure that the 'actively discourage anonymous complaints' wording for those with limited options are not deterred.
 - added the Modern Slavery and Exploitation Helpline as an additional source of support.
 - to provide assurances that wellbeing and safety will be prioritised.
 - created multiple escalation routes to improve reporting.
 - set out exceptions to sharing information with implicated employees.
 - considered how anonymous and non-staff reporting can be made available to the people we support by producing an easy read document.
- Established a clear lead responsible for procurement processes.
- Raised awareness across the organisation by developing the modern slavery page on our intranet.

Business and operational structure

Avenues is a charitable organisation with an annual turnover of circa £70m per annum and is comprised of the parent (Avenues Group), five operating subsidiaries and one non trading subsidiary called Avenues Management Services Limited (AMSL). AMSL is not an employer and therefore this statement focuses only on the Avenues Group, Avenues London, Avenues South, Avenues South East, Avenues East and Autism Hampshire.

Our parent company is comprised of central teams that support and enable the delivery of high-quality services to those that we support. Our operating subsidiaries enable us to retain local focus, but Group practices remain aligned and strategic priorities of each are dictated by the parent company. This includes our modern slavery strategy which is developed by the Group for and on behalf of its subsidiaries.

The parent company also employs a bank of zero hours workers who are deployed to cover vacant shifts in our operating subsidiaries. Our operating subsidiaries deliver support to people with learning disabilities, autism and acquired brain injuries in their own homes across the East and South East of England and in Shropshire. Other than the zero hours workers, support staff have contracted hours and are employed by the subsidiary in which they work. Worker welfare practices for zero and contracted hours employees including recruitment, reward, training, and performance management are delivered via Group policies and compliance, and best practice is assured through our central HR team.

Avenues has an extensive network of partners that enables us to deliver essential services to people that need them, including but not limited to:

- Digital and IT support – including IT hardware
- Auditors and insurers
- Legal advice and support
- Occupational health
- Recruitment partners
- Utilities
- Fleet vehicles
- Repairs and maintenance
- Temporary labour supply

Where we are unable to fill shifts through contracted or zero hours we use temporary labour via a neutral vendor. Our repairs and maintenance Preferred Supplier List (PSL) is extensive. Both repairs and maintenance and temporary agency supply have been verified as our largest areas of supply chain spend and suppliers in both areas are extensive and we therefore acknowledge these as our highest areas of modern slavery risk.

Governance structure

These are the key internal roles that have responsibility for modern slavery.



The Modern Slavery Strategic Lead is the designated person in Avenues responsible for overseeing how the organisation prevents, identifies and responds to the risk of modern slavery and human trafficking within its operations and supply chains. This is a member of the EMT reporting to the CEO.

The Modern Slavery Procurement Lead is responsible for ensuring that Avenues purchasing and supply chain practices do not contribute to modern slavery. This role is specifically focused on procurement and supplier management and reports into the CEO.

The Modern Slavery Employee Welfare and Compliance Lead is responsible for ensuring that Avenues workforce and employment practices are free from modern slavery risks and that staff comply with relevant policies and legal obligations and reports into the Director of People and OD.

The Executive Management Team set the tone for Avenues that preventing modern slavery is an organisational priority and not just a compliance exercise whilst the Board holds the Executive accountable for modern slavery compliance and performance including the mitigation of a strategic risk on our register.

The Executive Management Team and the board hold us to account for our progress in respect of implementing robust due diligence processes, conducting regular risk assessments, undertaking supply chain audits, employee training, strengthening supplier contracts and developing our practice beyond compliance with the Modern Slavery Act and towards best practice.

Policies, processes, and considerations

Modern slavery considerations guide our business practices and decisions by ensuring that human rights and ethical labour standards are embedded into how the organisation operates.

The following policies make specific mention of modern slavery in all its forms.

Our **Whistleblowing Policy** specifies that employees can raise concerns confidentially and if preferred, anonymously via an external provider who offers translation services for people that need it. Posters advertising their services and translation abilities are displayed around the organisation.

Our **Grievance Policy** makes clear that concerns regarding modern slavery can be raised as a grievance and clearly make provision for anonymous reporting for those that require it.

Our **Complaints Procedure** enables non employees and members of the public to raise their concerns anonymously if needed, and to have those concerns responded to quickly.

Our **Safeguarding Adults Policy** and procedures are extensive and cover a full range of safeguarding matters including modern slavery in all its forms. An easy read version of

the procedure is available should a person we support need to disclose an allegation of modern slavery.

Our **Agency Policy** and procedure sets clear expectations for our agency partners and clarifies the due diligence that is carried out on each agency to ensure that they are not introducing modern slavery risks to our organisation.

Safer Recruitment sets out the comprehensive processes which Avenues follows when recruiting its own workforce. It conforms to legislative and regulatory requirements and represents best practice in recruitment.

Avenues has a central framework for policy management and maintains a policy library whereby organisational policies set out a framework within which employees and the organisation operate. All policies are developed by subject matter experts within a standard defined process which includes ratification by two internal nominees. Policies are reviewed regularly according to the subject matter, but no longer than every three years.

Operational due diligence

Procurement Principles

Avenues operates a robust procurement policy which clearly outlines principles that we manage the modern slavery risk along our supply chain. Avenues procurement principles do not consider the cost of goods as the only deciding factor when considering contracts and this aligns with our integrity value. To support our future aspirations of introducing due diligence measures such as supply chain mapping, supplier questionnaires, supplier audits, modern slavery contract clauses or standards within the code of conduct, and a formal assessment of modern slavery risks, Avenues has established a Procurement role ensuring there is an identified person responsible for these processes. This individual will receive modern slavery training and support the introduction of supply chain due diligence measures.

Risk Assessment

Avenues recognises the individual and business risk of modern slavery and this is documented on the organisations strategic risk register along with risk mitigations and reviewed and amended monthly by the Director of People and ratified monthly by the Executive and quarterly by the Board. Strategic risk is Avenues has identified that repairs and maintenance and temporary labour supply are its highest risk procurement categories.

On behalf of Avenues, our neutral vendor partner, Neuven, undertakes due diligence on each agency prior to adding them to our panel of suppliers of temporary labour. Due diligence considers background checks, financial assessments, and references.

In collaboration with Neuven, all agencies and their worker welfare practices are annually desktop audited with clear processes for agency removal/reporting documented and in place. Opportunities for agencies to make improvements are also available dependent

on their audit score and Neuen support them to improve over a short period and verify this improvement through a further audit.

Audits consider a range of areas that verify their broad worker welfare practices, and this includes but is not limited to their recruitment practices, existence of a modern slavery policy which is available to workers and payslip checks to ensure that the rates of pay agreed between Avenues and the agency reach the worker. All agency staff must also demonstrate sufficient language competency prior to being booked to work with Avenues enabling workers to understand contracts and policies and promoting communication with management and improving the probability of reporting concerns. An agency worker handbook is in development to support agency workers on a range of matters but specifically to ensure they know and understand the standards of treatment they should expect and ways to raise concerns that they hold. This will form a part of a wider framework in due course which will incorporate a supplier code of conduct.

Avenues has undertaken a robust risk assessment of temporary labour supply which it identifies as being a high-risk area. The risk assessment demonstrates the risk, controls in place and controls that we are working towards whilst rating the existing risk based upon likelihood and impact and setting a target risk rating that will be achieved when all controls are in place. Further areas such as recruitment will be assessed in a similar manner. Mitigations include training, awareness, audits, partnerships, policies which support and clarify reporting, escalation, and remediation practices.

Our HR team undertake assessments of employees where the same address, phone number and/or bank account is used multiple times. This review takes place twice annually and where duplication is detected everyone is followed up with. To date, modern slavery has not been detected despite some duplication existing which has been due to family members living and working together.

HR, recruitment, and worker representation

Responsible recruitment is key in preventing exploitation, especially for vulnerable groups such as agency staff or migrant workers. The following practices make sure that due diligence is not just a one-off exercise but a continuous process building resilience against modern slavery across our operations and supply chains.

- Employees are never charged fees or costs for securing a job with us, following the Employers Pays Principle which will be formally launched and publicised in October 2025
- All hiring managers are trained to recruit in accordance with the process that is documented
- All employees are provided with clear, accessible information about their rights, pay and conditions before they start employment
- We only work with reputable agencies who are audited and compliant with modern slavery and ethical recruitment standards.
- Verification of identity and right to work checks are carried out to ensure employees are not trafficked or coerced.
- All rates of pay are compliant with regulatory or contractual requirements, whichever is higher

- New employees are invited to participate in stay interviews undertaken by the HR team at 3 and 10 months service and participate in monthly probation reviews in the first 6 months of employment. All employees, including zero hours contracted workers, can contribute to the annual staff survey and various focus groups. This provides multiple opportunities for employees to raise concerns. Managers are aware of the risks of modern slavery through awareness raising campaigns and are therefore equipped to escalate concerns raised.

Grievance mechanisms, escalation, and remediation

Avenues has a Grievance Policy and Procedure aimed at employees and is intended for employees to use to make known any concerns they have about their treatment at work. This would by its nature include concerns about modern slavery. We have an Employee Relations Team who provide specialist advice and support to managers who are investigating grievances to follow the process to its rightful conclusion and to support employees who are aggrieved during the investigative process. We recognise that anonymous complaints are notoriously difficult to investigate, and we therefore encourage people not to do this, but we do accept that by the nature of modern slavery individuals may feel they have little choice, and we endeavour to fully investigate anonymous complaints possible.

Employees who are concerned about a colleague or person we support and workers who have concerns for themselves or a colleague can blow the whistle. They can do this by contacting the whistleblowing officer at Avenues or alternatively by contacting Safecall, an independent whistleblowing helpline. Individuals contacting Safecall can do so by fully disclosing their details, entirely anonymously or semi anonymously. By raising concerns on a semi anonymous basis, Avenues can pose questions to the complainant via Safecall without knowing who the complainant is. This is particularly important in cases of modern slavery whereby individuals may feel they must be anonymous.

Both the grievance and whistleblowing policies are available on the intranet and whistleblowing posters are visible around the organisation.

To date we have not received any whistleblowing or grievance reports regarding modern slavery. We are aware that having streamlined the reporting process and better publicised the whistleblowing line and its translation services, the number of reports may well increase.

Where we receive reports of modern slavery concerns regarding a supplier we would, where appropriate, work with that supplier to address any poor practices that exist and to make improvements. In more serious cases or where the affected individual does not wish to work with the supplier to make improvements, Avenues would consider bringing our working relationship to an end and potentially reporting the practice of concern. We would of course continue to work to support the individual until the situation is resolved.

Training

A full and comprehensive training programme is key to achieving a collective understanding of how modern slavery could affect the business and individuals.

In October 2025 Avenues will launch mandatory modern slavery training to develop an organisational understanding of modern slavery risks and how to identify and report cases. Senior Leaders, modern slavery leads, those with safeguarding responsibilities and those responsible for high-risk areas will be prioritised for this training resulting in the training of the Executive, Senior Leadership Teams, Regional Directors, Senior Operations Managers, Service Managers and HR teams.

This is supported by a wider awareness raising campaign which has supported improved knowledge and understanding of modern slavery, its risks and reporting lines. A dedicated intranet page serves as a one stop shop for the workforce and contains briefings, case studies relevant to the sector and the ways in which people can report concerns both internally and externally.

Induction and Safeguarding training both refer to modern slavery, the signs and reporting responsibilities.

Our priorities over the next year

Our performance indicators

- ✓ **Improve our awareness of modern slavery risks through:** a detailed risk assessment of the recruitment process and supply chain mapping
- ✓ **Increase awareness and improve reporting lines through:** training, clear induction paperwork, general awareness building, an agency worker handbook, modern slavery policy, improved safeguarding policy, updated safeguarding training, improved gender pay awareness
- ✓ **Adopt practices that reduce or prevent modern slavery occurring through:** formal adoption of the employer pays principle

We will

- Assess risks in the recruitment process including the high risk of care sector workers and agency workers and document controls.
- Ensure that induction processes/documentation clearly covers key areas such as employees' rights and relevant policies and ensure these are documented in the induction schedule.
- Commit to the Employer Pays Principle.
- Document our gender pay gap outcomes to include why gaps exist and steps being taken to eliminate them.
- Develop our safeguarding policies to consistently refer to the types of modern slavery and that these types are the most common/relatable ones.
- Continue to build general awareness across the organisation by having an anti-slavery week and regular 3 monthly spotlights.
- Develop safeguarding training, highlighting the different responses that would be required if a case of modern slavery were identified and fully clarifying the types of modern slavery and indicators.
- Develop a Modern Slavery policy aligned to our statement.
- Begin a process of assessing our supply chain and associated risks with a view to eliminate them.

- Develop an agency worker handbook to improve understanding of the ways in which they can report concerns.
- Train senior managers and specialists in modern slavery.

Approval

This statement was approved by the Group Chief Executive Officer following ratification by the Board of The Avenues Group.

Signed by:

Date: 15.10.2025

Position: Group Chief Executive Officer