Modern Slavery and Human Trafficking Statement

This Statement Relates to the following Legislation and Regulations and Statutory Guidance

- section 52 of the modern slavery act 2015
- care of unaccompanied migrant children and child victims of modern slavery: statutory guidance for local authorities (November 2017)
- safeguarding children who may have been trafficked (October 2011)
- working together to safeguard children 2023 (December 2023)
- nationality, immigration and asylum act 2002
- rape and sexual offences - chapter 7: key legislation and offences

This Statement Applies To:

a) All those directly and currently employed by The Lioncare Group and who have received and accepted a statement of terms and conditions of employment from the company.

b) All visitors attending premises owned and operated by The Lioncare Group.

c) All contractors temporarily undertaking works at premises owned and operated by The Lioncare Group.

Responsibilities Associated with this Statement:

All employees, whether they are 'front-line' engaged directly in the task of caring for, educating, and supporting the children in our care, or 'ancillary' (e.g. house keeper, maintenance worker, administrator etc.), are personally responsible for managing their own conduct in relation to following this policy.

All employees whether they are 'front-line' or 'ancillary' are also responsible for supporting their colleagues and co-workers to follow this policy.

Members of the management team (senior therapeutic carers, therapeutic support team manager, deputy managers, school operations manager, business manager, training manager, registered managers, head teacher,) are responsible for ensuring all those employed directly are made aware of this policy and guidance, and for managing and monitoring its appropriate implementation, and for taking necessary action to guard against any breach of this policy.

The executive team (chief operations officer and chief executive officer) are responsible for reviewing this policy periodically, and for ensuring this policy remains fit-for-purpose.

Monitoring and Review of this Statement:

This policy and its implementation and including any corresponding guidance will be monitored periodically by the executive team and in consultation with relevant persons.

Our Modern Slavery and Human Trafficking Statement

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within the UK, and they may be trafficked for a number of reasons including sexual exploitation, forced labour, domestic servitude and organ harvesting.

The organised crime of child trafficking has been an issue of considerable concern to all professionals with responsibility for the care and protection of children for some years. Victims may be trafficked into, out of or within the UK. Since the passing of the modern slavery act 2015, crimes related to human trafficking have been incorporated into the broader term 'modern slavery'.

Modern slavery includes slavery, servitude and forced or compulsory labour, as well as human trafficking. Child and adult victims may be trafficked into the UK and then sexually exploited or forced to work. Any form of modern slavery including trafficking children is an abuse. Children are coerced, deceived or forced into the control of others who seek to profit from their exploitation and suffering.

The modern slavery act, 2015 requires any organisation with a global annual turnover of £36 million or above and which operates in the United Kingdom, to produce an annual statement. The Lioncare Group does not have a turnover of £36 million or above; however, we have nonetheless published this statement to evidence our commitment to doing business in a responsible and sustainable way. This includes a commitment to do all that we reasonably can to prevent all forms of modern slavery in any part of our own business and our supply chain.

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The Lioncare Group primarily provides therapeutic residential childcare and therapeutic special education, and also provides training and coaching and consultancy to those working and operating in the children's social care and special schools and education settings sectors.

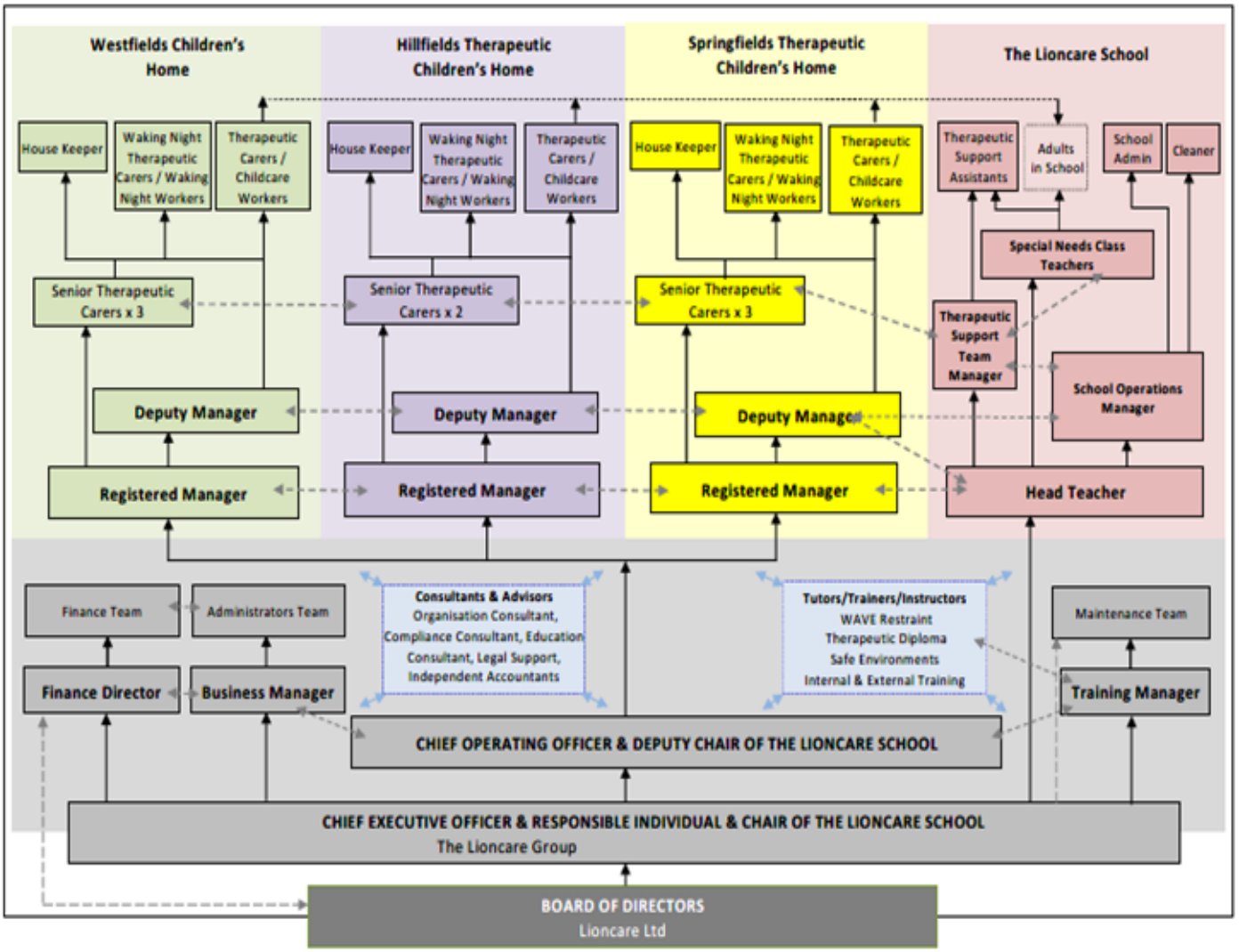
As a small organisation operating in a specialised segment of the market and offering a particular kind of service, we recognise the limitations of our reach in regard to the potential to influence suppliers and customers in developing and improving their understanding of and ability to identify modern slavery and human trafficking; where we can, we do. We can explore and seek ways to empower our colleagues to identify signs and risks of modern slavery, and provide information and guidance on the routes for reporting any suspicions or evidence. We expect our employees, and those associated with supporting the services we provide (i.e. our limited supply chain) to share and uphold these ethical values and principles.

This modern slavery and human trafficking statement is made on behalf of Lioncare Ltd operating as The Lioncare Group pursuant to section 54(1) of the modern slavery act 2015.

Our Business

The Lioncare Group is a small business and currently employs 75 employees in total. We have capacity to care for up to 18 children in our homes and educate up to 17 children in our school. Our organisation is structured as shown in figure 1.

Fig.1: Organisation of The Lioncare Group[1]



The Lioncare Group is the operating name for Lioncare Ltd, established in 1991, and primarily concerned with therapeutic residential childcare, therapeutic special education, and therapeutically informed training and learning and consultancy provision.

[1] As of 20.06.24

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We currently operate:

- three therapeutic children's homes (Springfields Therapeutic Children's Home opened in 1998, Hillfields Therapeutic Children's Home opened in 2015, and Westfields Children's Home re-launched in 2018)
- an independent SEMH school (The Lioncare School opened in 1995)
- an 18+ supported accommodation project (comprising West House, Hill House, Portland Road and New Church Road)
- a training and learning and consultancy service

We provide specialised individual programmes of therapeutic childcare in family-like group settings for children aged (on admission) between 6-12 years old at Springfields, 10-14 years old at Westfields, and 12-16 years old at Hillfields, a special curriculum of therapeutic education in a small DfE registered independent school setting for children aged between 7 years and 16 years, and bespoke programmes of supported accommodation for young adult care-leavers aged 18 years and over. All children looked after and educated by The Lioncare Group are funded by their local authority and accommodated under section 20 of the Children's Act 1989 or subject to a full care order under section 31 of the Children's Act 1989.

The Lioncare School is a specialist educational setting linked to The Lioncare Group's residential provision, but equally able to accept children learning elsewhere. Designed for children with social, emotional, mental health and/or behavioural difficulties, it offers a unique skills-based curriculum that encourages academic progress while also promoting positive participation in group and community life alongside essential individual work on resilience, self-regulation, confidence, engagement and enjoyment. Our model of therapeutic education embeds sound teaching and learning practice in to an approach informed by theories of attachment, awareness of the impact of trauma and the principles of psychodynamics. The Lioncare School aspires to work within the standards and values central to being a therapeutic community.

Our practice is based in psychodynamic and psycho-social theory and the therapeutic community approach. Psychodynamic theory is used to describe the internal psychic conflict that goes on inside all of us that sometimes results in unwanted behaviours. The work of psychotherapists and those who work in a psychodynamic way is to try and change the person from within, that is to see the behaviours as symptoms of the inner conflicts and to view these as meaningful communications about inner states of conflict, and try to address the causes of the symptoms rather than to rectify the behaviours. In this way, we can begin to more usefully understand children's behaviours as communications of unmet needs.

All employees of The Lioncare Group are provided with a planned and comprehensive 2-week orientation programme prior to undertaking care duties or role responsibilities, followed by a 6-month basic induction training programme[2]. We consider provision of a basic training programme as being a crucial element in enabling new employees and colleagues to make a satisfactory and positive start to their career with the organisation, maintaining high standards of good enough care and education provision to the children, and ensuring at all times the safety and welfare of the children in our care.

We are committed to creating and ensuring a non-discriminatory and respectful working environment for our colleagues. We want all our colleagues to feel confident that they can expose wrongdoing without any risk to themselves, and as such The Lioncare Group has an established whistleblowing policy and procedure which all colleagues can access, alongside all our other policies and procedures, on GDrive records management system provided by the company. We do not enter business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our Supply Chains

As a small business providing specialist therapeutic residential childcare and specialist SEMH education, our supply chains are extremely limited and short; the nature of our business does not require us to rely on extensive networks of businesses or people to help us achieve our business objectives. Most of the services we require are developed in-house to promote ownership by the workforce and create opportunities for career progression. Those few services that we cannot develop or operate ourselves are provided by a small group of individual qualified expert professionals commissioned on a consultancy basis, or accessed through public services (e.g. NHS) and 'every-day'

[2] This includes all employees (full time and part-time) and all positions including agency workers and maintenance / administration / domiciliary workers. The basic training programme is tailored to suit the job specifications for each position.

general means (e.g. supermarkets and high-street retailers etc.).

Our Policies And Controls

Our commitment to conducting business ethically and responsibly is reinforced throughout various company policies, including our:

- whistleblowing policy and procedure
- complaint (external) policy and procedure
- employee wellbeing policy and procedure)
- health and safety statement and policy 2024-2025
- safeguarding policy
- safer recruitment policy and procedure
- corporate social responsibility policy
- equality and diversity policy
- environmental management policy

Employees

The Lioncare Group is committed to following safer recruitment processes and procedures, as evidenced in our safer recruitment policy and procedure and our safeguarding policy. We always carry out robust pre-employment checks on all directly employed colleagues, and we insist that any recruitment agency used for providing temporary workers undertake and provide us with evidence of robust pre-employment checks and vetting.

Our underpinning therapeutic ethos and practice informs our policies and procedures and provisions, and ensure all are designed and implemented to protect the children in our care and our colleagues from poor treatment or exploitation. This includes robust and effective safeguarding and protecting the children in our care and equal pay and conditions of employment as a given. There are also a range of benefits, including health and wellbeing support, and access to training and development opportunities.

Where changes to employment, work, organisation and policies and procedures are proposed, there is communication and negotiation with the workforce, as appropriate. Our commitment to engage and involve colleagues in matters which affect them include provision of regular and reliable individual practice-based supervision, group consultancy, team meetings, management meetings, leadership team meetings, and an 'open-door-policy' that encourages respect, the flow of information and freedom of expression amongst all employees and colleagues regardless of role or position.

Because of all the above, we believe that the risk of forced or trafficked labour being directly employed by The Lioncare Group is low, but we are not complacent and understand the need to remain aware and on the alert. We have over recent years, implemented an organisation-wide programme of education and training and awareness raising on the very present risks of domestic violence and coercive control being experienced by colleagues. We remain vigilant and alert at all times to the very real danger of the children in our care or/and attending our school being victims of trafficking and exploitation (criminal and sexual).

Risk Assessment and Management

We recognise and acknowledge, from the moment a candidate applies for employment with The Lioncare Group or a child is referred to The Lioncare Group by their local authority, of the possibility of them being at risk of or experiencing modern slavery or trafficking. Whilst an employee and a child are equally potentially at risk to slavery and trafficking, the children in our care are especially at risk from criminal exploitation or sexual exploitation, whilst an employee and colleague is especially at risk from domestic violence and coercive control.

Our commitment to safer recruitment practice and procedures, and effective referral and admission practice and procedures, alongside our robust ongoing risk assessment and risk management policy and associated procedures, assist us in identifying and supporting individuals at risk at a very early stage of their employment or (in the case of a child) their placement in our homes or school.

Our commitment to promoting and developing openness and honesty in communication and professional relationships across our workforce, and developing the same ethos and culture in the children we care for, further supports our ability to identify at an early stage, and thereby better assess and manage risk and protect others from

modern slavery and trafficking.

We are and remain committed to providing regular and reliable spaces and time and opportunities for employees and children alike to discuss and explore and, if applicable, share concerns they may have related to modern slavery and trafficking and associated situations (e.g. exploitation or domestic violence).

Measures and forums provided for employees and colleagues include but are not limited to:

- individual practice-based supervision
- group consultancy
- team meetings
- management meetings
- leadership team meetings
- an 'open-door-policy' that encourages respect, the flow of information and freedom of expression amongst all employees and colleagues regardless of role or position.

Measures and forums provided for children in our care include but are not limited to:

- regular and reliable casework sessions (in the homes) and keywork sessions (in the school)
- group meetings
- community meetings
- visits by the independent person
- insistence on monthly social worker visits
- allocation of an advocate
- information given to all children on how to contact directly members of the leadership team of the organisaiuton
- bi-annual child-looked after review meetings

Training and Awareness-Raising Activity

The Lioncare Group currently provides extensive training (through online learning and face-to-face courses) to employees and colleagues, on subjects and issues that are connected with or related to modern slavery and human trafficking:

- domestic abuse & intimate partner violence (online)
- safeguarding & protecting children from harm (face-to-face)
- safeguarding children (online)
- child sexual exploitation (online)
- child criminal exploitation & county lines (online)
- safeguarding against radicalisation: the prevent duty (online)
- safer recruitment (online)
- safer recruitment (face-to-face)
- neurodiversity in the workplace (face-to-face)
- designated safeguarding lead level 5 (face-to-face)

However, through writing this statement it has become apparent that we don't yet specifically offer training in raising awareness of modern slavery and human trafficking. To rectify and address this, we have sourced an online course titled, 'raising awareness of trafficking and modern slavery'. We are offering this course now to those involved in recruitment processes and primarily responsible for personnel management; they will 'pilot' it and see if it is fit for purpose (i.e. raises awareness). If deemed suitable, we will look to roll this out more extensively over the following year (i.e. 2025).

Further Information: Support Services and Useful Contacts

- Modern Slavery Helpline 08000 121700
- UK Human Trafficking Centre (UKHTC) (0114 252 3891)
- CEOP - Child Exploitation and On-line Protection Centre (020 7238 2320)
- NSPCC Child Trafficking Advice and Information Line (0800 107 7057) - an advice and information service for professionals, a case consultancy service is also available by appointment.

- Refugee Council Children's Panel - Provides support to unaccompanied asylum-seeking children. ECPAT UK (020 7233 9887) - UK children's rights organisation campaigning to protect children from commercial sexual exploitation.
- UNICEF (020 7405 5592)
- Afruca (Africans Unite Against Child Abuse) (020 7704 2261) Promotes the welfare of African children in the UK and is concerned about cruelty against African children.
- CROP - Coalition for the Removal of Pimping (0113 240 3040) A voluntary organisation working to end the sexual exploitation of children and young people by pimps and traffickers.
- Foreign and Commonwealth Office website (0207 008 1500)
- Crime Reduction Toolkits - The Trafficking Toolkit
- The Missing People Helpline and the NSPCC Child Trafficking Advice and Information Helpline (0800 107 7057)
- Multi-agency Practice Principles for responding to child exploitation and extra-familial harm

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