

Modern Slavery and Human Trafficking Statement

Financial Year: 1st September 2017 to 31st August 2018

Introduction

This statement has been published in accordance with the requirements of section 54 (1) of the Modern Slavery Act 2015. The statement sets out the steps the East Midlands Education Trust has taken and is committing to take to understand all potential slavery or human trafficking risks related to our business and to put in place steps that are aimed at ensuring that these are eliminated within our own business or supply chains. This statement relates to actions and activities that have taken place during the Trust's financial year of 1st September 2017 to 31st August 2018.

Modern slavery is a term used to encapsulate the crimes of slavery, servitude, forced or compulsory labour and human trafficking. The East Midlands Education Trust is fully supportive of the government's objectives to eradicate slavery and human trafficking and does not engage in, or condone, these practices. We are committed to further improving our practices to enable us to identify and eradicate any slavery or human trafficking within our supply chains.

Organisational Structure

The East Midlands Education Trust was formed in September 2014 with a mission to raise the educational standards and improve the life chances of students within the partnership. Schools within our Trust represent the full age range of 3-19, and also include an alternative education provider.

During the 2017/2018 financial year, the Trust expanded rapidly from 6 to 12 schools. It is this expansion that took the Trust over the annual turnover limit of £36 million, which is the point that organisations are legally required to publish a modern slavery statement. The Trust exceeded a turnover of £36 million during August 2018, the final month of our accounting period.

Countries of Operation

The East Midlands Education Trust only operates within England and our contractors and suppliers are predominantly UK based.

Supply Chains

We have identified that some of our procurement takes place within sectors where slavery or human trafficking could occur, such as within cleaning, catering, security services, staff and student uniform supply, ICT equipment and the construction industry. However, this list is not exhaustive.

At present the Trust does not conduct audits of its suppliers and their business activities, nor do we investigate working conditions in our supply chains. However, now we fall within the scope of the Modern Slavery Act 2015, the Trust is committed to taking all steps available to manage and start to eliminate any risks.

Relevant Policies

The East Midlands Education Trust operates the following policies which are in the process of being reviewed and updated to describe our approach and steps to be taken to prevent slavery and human trafficking in our services and operations:

- **Whistleblowing Policy**

This policy ensures that all staff, Trustees, governors, volunteers, contractors and suppliers are able to raise any concerns about wrongdoing or malpractice within the Trust without fear of victimisation, subsequent discrimination or disadvantage. This would include any circumstances that may give rise to a risk of slavery or human trafficking.

- **Employee Code of Conduct**

The underlying principle of the Trust's Code of Conduct is that all staff must act within the law whilst undertaking their official duties. Staff must not undermine fundamental values, including democracy, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. These fundamental values would include any concerns regarding slavery or human trafficking.

- **Safer Recruitment Policy**

Although aimed predominantly at safeguarding the welfare of pupils within our schools, the Safer Recruitment Policy demands extensive checks are made on all potential staff, volunteers and contractors prior to starting work. Some of these checks have the potential to flag up concerns regarding slavery or human trafficking.

Next Steps

Although it is believed that there are no areas of the business at high risk of slavery or human trafficking, the following steps will be taken to protect workers from being exploited in this way within the Trust and within our supply chains:

- **Policy**

- Complete a review of internal policies and update these to identify and minimise the risks of slavery and human trafficking in our services and operations;
- Consider the creation and implementation of an Anti Modern Slavery and Human Trafficking Policy, or other policy, which outlines our duties as an employer, potential warning signs and what staff should do if they have concerns.

- **Procurement and the Supply Chain**

- Identify all Trust-wide suppliers and assess the level of risk attached to each to inform our future actions;
- Ensure slavery and human trafficking is included as an essential element of any tendering processes going forward;
- Consider implementing a Trust-wide preferred supplier list for larger contracts, using only contractors who have a good track record with regards the prevention of slavery and human trafficking.

- **Training and Awareness**

- Ensure all staff are notified about updated policies that refer to their duty to help prevent slavery and human trafficking in our services and operations;
- Implement more in-depth training for all staff involved in Procurement and HR to ensure they understand the risks of slavery and human trafficking.

This statement is made in accordance with the Modern Slavery Act 2015 section 54 (1) and constitutes our modern slavery and human trafficking statement for the financial year ending 31st August 2018.

Signed: *P Booth*

Patrick Booth
Chair of the HR Sub Committee