

# Modern Slavery and Human Trafficking Statement

Financial Year: 1 September 2021 to 31 August 2022

## 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 1 September 2021 to 31 August 2022.

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 is a Multi-Academy Trust providing education for pupils within the East Midlands region. The Trust comprises 9 secondary schools, 11 primary schools and 1 alternative education provider.

## 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;

- Cleaning;
- Catering;
- Security services;
- Staffing;
- uniform supply;
- ICT equipment;
- Construction.

However, this list is not exhaustive.

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## Relevant Policies

The East Midlands Education Trust operates the following policies which could help to reduce the risk of slavery and human trafficking within our organisation:

- **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.

- **Procurement Policy**

This policy is the backbone of the Trust's Procurement and Purchasing activities that all staff involved in Purchasing must follow. It sets Trust key principles in relation to Ethical Procurement including modern day slavery, trafficking, the use of child labour and bribery.

## Action Taken This Financial Year

- Trust Sustainability Policy now in draft form. This draft Policy currently includes key Ethical sections directly relating to Modern Slavery and Human Trafficking.
- The organisation has been restructured in areas and new positions created that have given an increased Supplier Management capacity.
- All central staff have had up to date Modern Slavery and Human Trafficking training via an online training portal which has now been made mandatory on an annual basis.

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## Future 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**

- Determine the final version of Ethical related policy items to be inserted and monitored via the Sustainability Policy, roll out and train staff.
- Consider a supplier's code of conduct which all or certain types of suppliers must comply with. Determine this and the level of detail in line with the wider Supplier Management strategies.
- Consider the creation 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**

- Create the new framework/standard relating to Trust Supplier Management, supplier rationalisation, segmentation and categorisation to allow for a more robust but manageable approach to better review key Ethical items within our supply chain.

- **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;
- Revise shared training platform to Implement Trust wide training for all budget holders, staff involved in Procurement and HR to ensure they understand the risks of modern 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 31 August 2022.

Signed:



**Patrick Booth**

Chair of the HR Sub Committee