



# **Modern Slavery and Human Trafficking Statement**

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<b>Owner:</b>	Laura Calton, Communications and Compliance Officer
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## 1. Introduction

- 1.1. This Statement is designed to satisfy the requirements of Part 6 Section 54 of the Modern Slavery Act (2015).
- 1.2. Outwood Grange Academies Trust does not engage in, or condone, the practices of human trafficking, slavery or forced labour. We are committed to the highest standards of ethical conduct in all our activities and making continuous improvements in this area.

## 2. About Outwood Grange Academies Trust (OGAT)

- 2.1. Outwood Grange Academies Trust is a not for profit sponsor of primary, junior, and secondary academies recognised nationally for our track-record of supporting schools and communities to deliver an outstanding education where children can thrive and staff have a fulfilling career.
- 2.2. This statement covers the activities of all 42 settings within the Trust.

## 3. Risk Management

- 3.1. The Trust methodically addresses the risks attaching to its objectives and associated activities with the goal of achieving sustained benefit within each activity and across the whole range of activities.
- 3.2. Risk management will be aimed at ensuring that the Trust achieves its objectives in the most effective way and those resources are directed at those objectives. It will not be seen as a separate exercise but as the means of best achieving the Trust's objectives.
- 3.3. The Trust's risk management strategy has been designed to provide a framework for managing the risks the Trust faces and ensuring its objectives are achieved in the most effective way. It has been designed for use by all staff of the Trust and it serves to:
  - Communicate the strategies for managing risk in the Trust
  - Establish procedures which should be adopted in the risk management process
- 3.4. The Trust's overall risk management plan is aimed at:
  - Protecting its students, staff and assets
  - Managing risk in accordance with best practice and reducing the cost of risk
  - Anticipating and responding to changing social, environmental and legislative requirements
  - Raising awareness of the need for risk management
  - Integrating risk management into the culture of the Trust
  - Adopting legal compliance as a minimum standard

## 4. Policies

- 4.1. The Trust is committed to safeguarding and promoting the welfare of all its students and our [Child Safeguarding Policy](#) is in line with the Local Safeguarding Children Board, Child Protection Procedures and DfE guidance.
  - 4.1.1. Each academy has a Designated Safeguarding Lead and Deputy.

- 4.1.2. Safeguarding link governors help to ensure our academy's fulfil their aim of protecting and promoting the welfare of their students and comply with all statutory guidance; they are the link between governors and the academy. They will raise awareness of safeguarding issues at Academy Council meetings and give information on practices within the academy. The Safeguarding link governor will also report to the Academy Council on the review of the Safeguarding Annual Audit.
- 4.1.3. The Trust pays full regard to DfE guidance 'Keeping Children Safe in Education' 2022. We ensure that all appropriate measures are applied in relation to everyone who works in a Trust academy who is likely to be perceived by the students as a safe and trustworthy adult, including volunteers and staff employed by contractors. Safer recruitment practice has been fully encompassed in the Trust's Recruitment Policy and its procedures. Safer recruitment practice includes scrutinising applications, verifying identity and qualifications, evidence of right to work in the UK, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking rigorous selection procedures and Disclosure and Barring Service (DBS) and other checks.

#### 4.2. Indicators of modern slavery

4.2.1 The International Labour Office has identified four sets of operational indicators for adult and child victims of trafficking for labour and sexual exploitation. Each set is a structured list of indicators relevant to the following dimensions of the trafficking definition:

- Deceptive recruitment (or deception during recruitment, transfer and transportation)
- Coercive recruitment (or coercion during recruitment, transfer and transportation)
- Recruitment by abuse of vulnerability
- Exploitative conditions of work
- Coercion at destination

A full list of the indicators under each heading can be found here: [Operational indicators of trafficking in human beings](#).

4.2.2 These indicators will be considered within the internal recruitment of staff to the workforce as potential indicators of previous Modern Slavery. They will also be considered within our Child Safeguarding procedures to identify children at risk of modern slavery.

4.3. We recognise that the public sector equality duty has three aims and they are to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct under the Act

- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who have a shared characteristic and those who do not

4.3.1. We aim to provide the highest possible education for all of our students. The ethos of our academies clearly reflects our commitment to fully including and respecting all members of our academy communities.

4.4. Outwood Grange Academies Trust has in place a [Whistleblowing Policy](#) which describes whistleblowing as the reporting by workers/employees, or ex-workers/employees, of wrongdoing such as fraud, malpractice, mismanagement, breach of health and safety law, child safeguarding concerns or any other illegal or unethical act on the part of management, the governing body, the Trust or by fellow employees.

4.4.1. An example of malpractice or illegal or unethical practice that may be reported under the Whistleblowing Procedure include:

- Public funds are being used in an unauthorised manner;

## 5. Procurement and Supply Chain Management

5.1. All procurement must be carried out in compliance with the principles of the EU Treaties, include the free movement of goods (Article 28 of the EC Treaty), the right of establishment (Article 43), the freedom to provide services (Article 49), non-discrimination and equal treatment, transparency, proportionality and mutual recognition. For most goods and services where contracts will have a value over their lifetime in excess of the OJEU threshold, a strict procedure must be followed in compliance with the Public Contracts Regulations 2015 and related regulations.

5.2. A considerable proportion of our procurement is with suppliers who are pre-approved either by a purchasing consortium, framework or appointed through means of a tender process. Our supply chains include:

- Education equipment, textbooks and resources suppliers
- Student and staff uniform suppliers
- Estate management maintenance and services
- ICT equipment and services
- Catering services and supplies
- Cleaning services and supplies
- Supply/agency staff

5.3. The Trust commits to ensuring that workers employed in its supply chains throughout the world are treated fairly, humanely and equitably in line with the Ethical Sourcing and Modern Slavery Policy. The Procurement Team recognises that the need for continuous improvement in the area of sustainability is essential and therefore will regularly review its policies and procedures.

- 5.4. The Procurement processes sets out the Trusts expectations of suppliers preventing Slavery and human trafficking in the following;
  - 5.4.1. Compliance with Law and regulations related to Modern Slavery, including Modern Slavery Act 2015
  - 5.4.2. Suppliers must adopt a Zero tolerance policy toward Modern Slavery and take proactive measures for prevention within their own operations and supply chain.
  - 5.4.3. Suppliers must conduct their own due diligence process to assess and manage their risk of modern slavery within their supply chains.
  - 5.4.4. Suppliers are required to accurate and transparent information about their business operations, including policies, procedures and efforts to combat Modern Slavery, including responding to FOI's and disclosing any known instances of slavery or human trafficking
  - 5.4.5. The Trust will audit suppliers to ensure compliance
  - 5.4.6. Suppliers must ensure all staff are adequately trained and aware of the risks, signs and reporting mechanisms related to Modern Slavery.
  - 5.4.7. Suppliers must have an internal reporting mechanism in place for employees to report concerns or suspicions of modern slavery occurrences.
  
- 5.5. As part of the Trust's procurement process, the procurement team carries out supplier due diligence to assess the risk of Modern Slavery within its supplier chains. This involves evaluating suppliers to ensure they meet the Trust's standards and expectations. The due diligence process includes,
  - 5.5.1. Risk Assessment: Identifying high risk areas or sectors within the supply chains where there is a higher likelihood of Modern Slavery
  - 5.5.2. Supplier Evaluation: Conduct assessments to evaluate ethical practices of existing and potential suppliers.
  - 5.5.3. Audits: Conduct audits to verify compliance with the Trust's Modern Slavery Policy and its expectations.
  - 5.5.4. Contractual obligations: Specific clauses are included within the contractual agreement with suppliers to comply with anti slavery laws and implement their own measures of prevention.
  - 5.5.5. Training and awareness: All members of the procurement team complete training on Modern Slavery risks, identification and reporting.
  - 5.5.6. Collaboration: The Trust collaborates with industry peers to share best practices.
  - 5.5.7. Monitoring and compliance: Regular monitoring of and review of suppliers to ensure compliance with the Trust's Anti slavery.
  - 5.5.8. Remediation and improvement: Where cases of modern slavery have been identified, the Trust will take immediate action. This may include engaging with the supplier to address the issues, terminating the contract and notifying appropriate bodies

6. Targets and KPIs for 2023 / 24

KPI	Method of Measurement		Target	Frequency
Staff Training and Awareness	<p>Percentage of staff who have received training on identifying and reporting signs of slavery and human trafficking</p> <p>Frequency of refresher training for staff.</p>	<p>Maintain staff records of who has received training.</p> <p>Conduct assessments to evaluate knowledge and awareness levels</p>	100%	Annual
Policies and Processes	<p>Existence and regular review of policies and processes address Slavery and Human Trafficking</p> <p>Compliance rate with policies and procedures related to slavery and human trafficking</p> <p>Number of reported incidents and effectiveness of response procedures</p>	<p>Review policies to ensure they are up to date with relevant law and legislation</p> <p>Conduct audits to determine compliance with modern slavery and ethical sourcing through finance and procurement activity</p> <p>Track the number of reported incidents and evaluate the effectiveness of response</p>		<p>Annual</p> <p>As per audit pipeline</p> <p>As occurred</p>
Supplier due diligence	<p>Percentage of suppliers assessed for compliance with Anti slavery and human trafficking requirements</p> <p>Number of high</p>	<p>Maintain records of supplier and track completion of due diligence assessments</p> <p>Conduct regular audits to assess compliance</p>	100%	As per tender



	<p>risk suppliers identified and appropriate actions taken.</p> <p>Frequency of audits conducted to ensure compliance with Anti slavery and human trafficking requirements</p>			
Student and Parent Awareness	<p>Percentage of students and parents who have received information recognising and reporting signs of slavery and human trafficking</p> <p>Feedback on the effectiveness of awareness campaigns and educational programmes</p>	<p>Conduct surveys to evaluate knowledge and awareness levels</p> <p>Track participation and feedback for awareness events</p>		
Reporting Mechanisms	<p>Existence and accessibility of confidential reporting channels for staff, students and parents to report concerns.</p> <p>Number of reported concerns, investigations conducted and outcomes</p>	<p>Monitor number of reports received through confidential reporting channels</p> <p>Track the number of investigations conducted and the outcomes</p>		
Partnership and collaboration	Engagements and partnerships with external organisations	Keep a record of partnerships established with external		

	<p>focusing on combating slavery and human trafficking</p> <p>Participation in relevant networks and sharing of best practices.</p> <p>Number of collaborative incentives undertaken to raise awareness</p>	<p>organisations and the nature of the collaboration</p> <p>Monitor participation in relevant networks and document the sharing best practices.</p> <p>Track the number of collaborative incentives undertaken and their impact</p>		
Continuous Improvement	<p>Evaluation of policies, processes and training programme to identify areas for improvement</p> <p>Implementation of improvement measure based on evaluation results</p> <p>Trend analysis of performance indicators</p>	<p>Conduct regular reviews on policies, processes and training programmes</p> <p>Implement feedback mechanisms</p> <p>Analyse trends over time to assess progress in prevention</p>	100%	

6.1 We have achieved:

- Appointed a Director of Religious Studies and Personal Development to support the LIFE curriculum
- We have included compliance with the Modern Slavery Act as a condition of supply for goods/services in specification and tender documents.
- All staff undertake statutory child safeguarding training.
- Finance Managers, Business Managers and Procurement Teams undertake Modern Slavery Training.
- Our 'New Supplier' form requests all suppliers adhere to the Modern Slavery Act 2015.

6.2 We have set ourselves the following objectives for 2023/24:

- Raise awareness amongst academy based teams involved in employment, procurement and management, of the risks of modern slavery occurring within our supply chains.
- To ensure that staff and governors are aware of current legislation surrounding equality and diversity and understand the Trust's responsibility
- To promote cultural understanding and awareness and tolerance of different religious beliefs between different ethnic groups within our academy communities.
- To promote mental health awareness and develop appropriate interventions where necessary.
- Actively close gaps in attainment and achievement between students for all groups of students; especially students eligible for Pupil Premium, students with special educational needs and disabilities, looked after children and students from minority ethnic groups.
- Continue to improve accessibility across the academy sites for students, staff and visitors with disabilities, including access to specialist teaching areas.
- Monitor the incidence of the use of homophobic, sexist and racist language by students in our academies.
- To continuously review and revise the KS1-5 curriculum so that it represents a diverse culture and society and encourages tolerance and respect.

**This statement has been approved by the Outwood Grange Academies Trust Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015**

**Chair of OGAT  
D Earnshaw MBE**

**Date: 18.12.2023**