

# Modern Slavery and Human Trafficking Statement

Version 1  
2022/23

**This policy applies to all NCLT institutions.**

## **CONTENTS**

<b>Paragraph Number</b>	<b>Heading</b>	<b>Page Number</b>
1.0	Introduction	3
2.0	Policies	3
3.0	Recruitment and Fair Pay	3
4.0	Risk Assessment	4
5.0	Whistleblowing	4
6.0	Procurement	4

## **1.0 Introduction**

- 1.1 This statement is designed to satisfy the requirements of Part 6 Section 54 of the Modern Slavery Act (2015).
- 1.2 As the Trust works mainly with UK based suppliers and contractors, their employees are protected under UK employment law and working time directives. Whilst the Trust does not conduct business in countries where there is a documented problem with human trafficking or modern slavery, we remain aware of the need to ensure that companies within our supply chain share our commitment to treating employees fairly and ethically.
- 1.3 This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking both within the Trust and within our supply chain to ensure that the organisation is fully compliant with the Act.
- 1.4 New Collaborative Learning 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 these areas.

## **2.0 Policies**

- 2.1 We review our existing policies and procedures in light of the Act and are confident that our policies promote good behaviour among our colleagues at work and within the Trust.
- 2.2 We are committed to paying people fairly and properly for their work; acting ethically and with integrity in all our business relationships; and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the Trust or our supply chains.
- 2.3 Our policies and procedures are kept under review to make sure they reflect the changing needs of the Trust and of staff, students and the communities we service. The Trust Executive Team review all Policies on a rolling basis and statutory policies are signed off by the Board of Directors.
- 2.4 Among the policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act are:
  - Staff Handbook and code of practice
  - Equality and Diversity Policy
  - Financial Procedures including Anti-Fraud Policy and Tender procedures
  - Safer Recruitment Policy
  - Whistleblowing Policy
  - Procurement Policy

## **3.0 Recruitment and Fair Pay**

- 3.1 Our recruitment processes include rigorous pre-employment checks for all new employees, volunteers and Advisers, Directors and Members. These include checks on, identity, right to work in the UK, references, qualifications and checks with the

Disclosure and Barring Service.

3.2 We must ensure that all applicants are genuine and acting freely. Similar checks will be carried out when using Supply Agencies by obtaining written verification from the agency that these checks have been conducted and the outcomes are satisfactory.

3.3 The Trust is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform. This is demonstrated through our commitment to ensuring staff receive at least the National Minimum Wage, set annually by the government. This commitment means that all staff, whether employed directly, as contractors or through our sub-contractors, receive at least the appropriate National Minimum Wage.

#### **4.0 Risk Assessment**

4.1 The Trust has assessed the risk of modern slavery and human trafficking as follows:

- **High risk activities** – The Trust does not believe there to be any high risk operations within the Trust or within our supply chain with regards to modern slavery and human trafficking.
- **Medium risk activities** – Supply chains linked to the catering, transport and cleaning provisions as a consequence of the Trust's use of external contractors.
- Supply chains linked to the manufacture of ICT equipment and clothing as a consequence of the Trust's use of external suppliers to provide items and the likelihood that suppliers are manufactured overseas.
- **Low risk activities** - Provision of agency staff predominantly in teaching and support staff.

#### **5.0 Whistleblowing**

5.1 The Trust encourages all its employees, contractors and other business partners to report any concerns related to their direct activities or supply chains. This includes any circumstances that may give rise to increased risk of slavery or human trafficking.

5.2 Our Whistleblowing Policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

#### **6.0 Procurement**

6.1 The Trust is committed to ensuring that its key suppliers adhere to the highest standards of ethics. We recognise that modern slavery is a complex supply chain issue and suppliers are required to demonstrate that they provide safe work conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

6.2 The Trust will work with its key suppliers to ensure that they meet these standards; any serious violation of the Trust's standards will lead to a review and possible termination of the business relationship.

- 6.3 All major supply contracts, notably those identified as presenting a medium or high risk are reviewed regularly.
- 6.4 New tender documents ask suppliers to report on whether they are compliant with the Act and we request copies of their Modern Slavery and Human Trafficking Statement where eligible.
- 6.5 This Modern Slavery and Human Trafficking Statement is published on the Trust's website. We request and review a copy of the same from our high and medium risk suppliers, as well as undertaking a number of due diligence checks on them which are in line with Public Contract Regulations 2015.

### Policy Status

<b>Policy Lead (Title)</b>	Chief Operating Officer	<b>Review Period</b>	Annually
<b>Reviewed By</b>	Trust Executive Team/ Board of Directors	<b>Equality Impact Assessment Completed (Y/N)</b>	N

### POLICY AMENDMENTS

<b>Version</b>	<b>Approval Date</b>	<b>Page No./Paragraph No.</b>	<b>Amendment</b>	<b>Audience</b>	<b>Plan for Communicating Amendments</b>
Version 1	TET 05/01/2023 BoD Mar 23		New policy	NCLT Staff, Students, Parents	NCLT Website