

Modern Slavery and Human Trafficking Statement

Version 4

This policy applies to all NCLT settings.



Wingfield Academy



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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 Modern slavery is a crime and a violation of fundamental human rights. The term Modern Slavery includes slavery, servitude, forced or compulsory labour, and human trafficking. It involves the exploitation of people for personal or commercial gain, where victims are treated as commodities, coerced, or deceived into situations they cannot leave.
- 1.3 We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in NCLT or in our supply chains. NCLT expects the same high standards from our contractors, suppliers and other business partners
- 1.4 NCLT comprises three sixth Form Colleges in West and South Yorkshire, three Primary Schools and three Secondary schools all in South Yorkshire, with over 10,000 pupils and students and employing over 4,000 employees (FTE). In the 2024-25 academic year, the Trust had a income of £75m including £46m in staff costs and £3.8m in non-staff expenditure. Goods and services purchased from third party suppliers and contractors are predominantly located within the UK.
- 1.5 Trust works mainly with UK based suppliers and contractors, whose employees are protected under UK employment law, including 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.

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 Polices 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 under the Act are:
 - NCLT Employment Policies, including our employee Terms and Condition of Employment

- Equality and Diversity Policy
- Financial Regulations Policy, Fraud and Irregularities Policy and Procurement Policy
- Staff Handbook and Code of Conduct requires all employees to follow NCLT Policies and Procedures
- Members, Directors and Advisors Code of Conduct, including the declaration to seven Nolan Principles of Public Life and demonstrate our commitment to ethical governance
- Safer Recruitment and Selection Policy
- Safeguarding and Child Protection Policy which raises details and raises awareness on Modern Slavery and human trafficking
- Complaints Policy
- Whistleblowing 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; online/social media, with the Disclosure and Barring Service; Fitness to Work; and, where relevant – Overseas Checks, prohibition from teaching and section 128 (Education and Skills Act 2008) checks.
- 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 individuals receive fair remuneration for the job they perform. This is demonstrated by ensuring staff receive at least the National Minimum Wage. This commitment means that all temporary workers, whether employed directly, or through an employment agency, receive at least the appropriate National Minimum Wage.

4.0 Staff Training

- 4.1 Staff induction training are made aware of our policies which include the requirements for addressing Modern Slavery. The Trust provides annual child protection training, including information on Modern Slavery and Human Trafficking.

5.0 Risk Assessment

- 5.1 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 construction, 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.

6.0 Whistleblowing

- 6.1 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 modern slavery or human trafficking.
- 6.2 Our Whistleblowing Policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

7.0 Procurement

- 7.1 The Trust reserves the right to exclude any bidder, contractor or service-provider who has been convicted of an offence under the Modern Slavery Act 2015.
- 7.2 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.
- 7.3 NCLT utilises procurement frameworks which comprehensively assess suppliers under the Modern Slavery Act requirements, including cleaning and catering services. NCLT's purchasing terms and conditions require contractors to comply with the law, including Modern Slavery requirements. NCLT works 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.
- 7.4 All major supply contracts, notably those identified as presenting a medium or high risk are reviewed regularly.
- 7.5 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.
- 7.6 This Modern Slavery and Human Trafficking Statement is published on the Trust's website. We request and review a copy of the same from the supplier types we

categorised as high and medium risk, as well as undertaking a number of due diligence checks consistent with the law, including the Procurement Act 2023.