



Modern Day Slavery Statement

Policy Code:	HR19
Policy Start Date:	October 2022
Policy Review Date:	October 2025

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1. Introduction

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2. The Trust has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3. This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by The Community Inclusive Trust (the Trust) and its to prevent modern slavery and human trafficking in its education arms, business units and supply chains.
- 1.4. The Trust and associated schools are all committed to ensuring there is transparency throughout our Trust and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. Organisation

- 2.1. The Community Inclusive Trust provides EYFS, primary, secondary and special education to a community of children and young people, as well as vocational, apprenticeship and teacher training opportunities to the post-16 sector. The Trust is the over-arching body responsible, at the end of the 2021/22 academic year, for 14 schools. The Trust, which also operates a LEARN Teaching Centre, employs more than 700 members of staff and has an annual turnover of more than £22 million.

3. Scope

- 3.1. This policy applies to all persons working for the Trust or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This statement does not currently form part of any employee's contract of employment but the Trust reserves the right to amend it at any time.

4. Our supply chains

- 4.1. The Trust seeks excellence in every area of the organisation and strives to ensure the highest standards of professionalism, integrity and ethical business practice. We are committed to conducting our business in a lawful manner and this includes engaging with our suppliers to ensure that they share our high standards.
- 4.2. We buy a wide range of external goods and services, including construction services and supplies, furniture and stationery, electronics (computers, audio visual etc.), food and catering supplies, travel services, laboratory supplies (equipment, chemicals etc.), books, cleaning services, printing and waste and recycling services and do so in accordance with public procurement law. A large proportion is bought through frameworks established by collaborative consortia.
- 4.3. We expect our suppliers to fulfil their obligations to comply with the provisions of the Modern Slavery Act. Modern Slavery and Human Trafficking are included within our new supplier risk assessment and due diligence procedures. We will continue to build upon our existing systems to identify, assess and monitor potential risk in our supply chains. 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.

5. Responsibility for the policy

- 5.1. The Trust Board has overall responsibility for ensuring this policy is in place and the Executive Leadership Team have day to day responsibility to ensure compliance with our legal and ethical obligation
- 5.2. The Director of Governance and Operations has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 5.3. Head Teachers, Department Heads and any staff member that has a direct report has a responsibility for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

6. Compliance with this policy

- 6.1. You must ensure that you read, understand and comply with this policy.
- 6.2. The prevention, detection and reporting of modern slavery in any part of our Trust or supply chains is the responsibility of all those working with and for us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 6.3. You must notify your Head Teacher, Line Manager or the Director of Governance and Operations as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 6.4. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our Trust or supply chains of any supplier tier at the earliest possible stage.
- 6.5. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Director of Governance and Operations or you may report it in accordance with our Whistleblowing Policy as soon as possible.
- 6.6. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your Head Teacher, Line Manager or the Director of Governance and Operations.
- 6.7. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Trust is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own Trust or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure which can be found on the Trust Intranet or from the HR department.

7. Training and policies

- 7.1. The Trust reminds all employees and volunteers on an annual basis of the values included within its Code of Conduct and receives acknowledgement of the Code from its freelancers, consultants and suppliers. Our HR team and associated support staff are trained to ensure, through our rigorous recruitment checks, that we do not employ people who are under-age or who do not have the right to work in the UK. Our contracts continue to adhere to the European Working Time Directive.
- 7.2. The Trust operates a Whistleblowing Policy, aimed principally at our employees but also available to our suppliers, which encourages the reporting of any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated and appropriate remedial action taken. The Trust's Anti-Fraud and Anti-Corruption Policy reinforces the principles of ethical working practices.

- 7.3. Additional training on this policy, and on the risk our Trust faces from modern slavery in its supply chains, will be provided as and when necessary outside of the normal period and for any new staff joining the Trust.
- 7.4. The Trust's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

8. Further steps

- 8.1. The trust is committed to continually reviewing and improving its practices to ensure modern slavery is in no way a part of its operations. The Trust has implemented various control measures to increase our oversight of ethical procurement and recruitment which includes but is not limited to:
 - Effective communications with our suppliers to confirm their understanding and compliance in line with our expectations. All new supplier forms include a modern slavery and human trafficking clause for the supplier's confirmation prior to the Trust using them as a supplier.
 - A centralised procurement policy has been initiated with Trust Board approval which includes modern slavery and human trafficking information as part of the approved tender process.
 - Modern slavery and human trafficking clauses have been included within our standard terms and conditions.
 - Specific training on modern slavery risks for all groups of staff to ensure that any potential risks are identified and mitigated.

9. Breaches of this policy

- 9.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 9.2. The Trust will terminate our relationship with immediate effect with other individuals and organisations working on our behalf if they are found to be in breach of this policy.

10. Governance

- 10.1. This statement has been approved in full by the Community Inclusive Trust board of trustees, pursuant to the fulfilment of its obligations under section 54(1) of the Modern Slavery Act 2015.
- 10.2. This policy will be formally reviewed on a three-year cycle, or earlier if significant changes are required.