

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out Cabot Learning Federation's (CLF) actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 September 2018 to 31 August 2019.

The CLF, as part of the education sector, recognises its responsibility towards taking a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

The CLF is a growing Multi Academy Trust. It comprises of over 20 entities serving the educational needs of circa 9,000 children and young people aged 3 to 19 and employing circa 1,700 colleagues.

In addition to CLF's core activity of delivering education to our children and young people other business activities include operating school centred initial teacher training, other training, school to school support and income generation through lettings.

The CLF's educational and business activities are delivered wholly within the UK and is predominately a service based organisation. 75% of our turnover is spent on staffing to deliver a high quality education to our students. It procures goods and services from providers predominantly based within the UK.

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies and Risk Assessments:** The CLF's Director for Education, Corporate Services Director, Finance Director and HR Director are responsible for putting in place and reviewing policies and the process by which they were developed. In addition, they are responsible for the broader organisational responsibility for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** Principals and their leadership teams, Designated Safeguarding Leads, the Corporate Services team, Finance team and HR team are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking relevant to their sphere of responsibility.
- **Training:** The Director of CLF Institute is responsible for delivering training solutions that increase awareness and a better understanding of and response to identified slavery and human trafficking risks.

- **Relevant policies**

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Recruitment, selection and disclosure policy and procedure** The CLF solely employs colleagues within the UK. Its recruitment practices are in accordance with Keeping Children Safe in Education. All academies have 2 safeguarding audits carried out each year as follows:
 - An internal audit carried out by the academy and submitted to the Local Authority;
 - An audit carried out by the federation's Designated Safeguarding Lead.
- **Whistleblowing policy** The CLF encourages all its colleagues to disclose any activity which relates to danger, bribery, corruption, fraud or other unlawful unethical conduct in the workplace. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** The CLF's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The CLF strives to maintain the highest standards of employee conduct and ethical behaviour.
- **Anti-bribery and corruption policy** The CLF is committed to implementing effective measures to conduct its business activities in an honest and ethical manner.
- **Financial Regulations** The CLF is committed to delivering a responsible procurement policy that ensures its suppliers adhere to the modern slavery act. Any breach of the act will lead to the termination of the contract.
- **Recruitment Agencies** The organisation uses only specified, reputable employment agencies to source labour.

Procurement, Due Diligence and Supply Chain Management

The CLF is committed to ensuring its suppliers adhere to the highest standards of ethics. The larger value contracts are procured either through a purchasing framework or appointed through means of a tender process. Our supply chain includes a range of goods and services with the majority purchased within the UK.

We have identified that some of our procurement takes place in sectors where modern slavery offences could occur. We will be taking the following steps to promote awareness during 2019:

- Update our New Supplier form to request all suppliers must sign and confirm adhere to the Modern Slavery Act. Then evaluate the modern slavery and human trafficking risk of each supplier.
- Updating our financial regulations and procurement practices to ensure greater scrutiny around compliance at the procurement stage; including compliance with the Modern Slavery Act as a condition or criterion in specification and tender documents wherever possible.
- Conduct a more in-depth review of our supply chains to better understand the risks of modern slavery occurring within them.

Performance indicators

The CLF has reviewed its key performance indicators (KPIs). As a result, the CLF is:

- requiring all CLF Academy leaders, Operations Managers, Finance professionals, Corporate Services Professionals and HR Professionals to have completed training on modern slavery by 31 August 2019;
- developing a system for supply chain verification expected to be in place by 31 August 2019, whereby the CLF evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains expected to be completed by 31 August 2019 whereby the organisation evaluates all existing suppliers.

Training

The CLF requires all CLF Academy leaders, Operations Managers, Designated Safeguarding Leads, Finance professionals, Corporate Services Professionals and HR professionals to complete training on modern slavery.

The organisation's modern slavery training covers:

- CLF's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains. our purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how the CLF can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and

- what external help is available, for example through the Modern Slavery Helpline.

This statement was approved on 25th April 2019 by the undersigned on behalf of the Cabot Learning Federation.



Steve Taylor, CEO