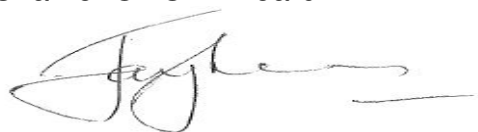


# MODERN SLAVERY STATEMENT

The OHC&AT Board of Directors has agreed this Statement – 25<sup>th</sup> February 2020.

Jay Mercer  
Chair of OHCAT Board



Peter Lauener  
Chair of OHC Board



# Modern Slavery Statement

## INTRODUCTION

Orchard Hill College & Academy Trust (OHC&AT) is committed to providing outstanding educational opportunities for all our pupils and students. OHC&AT is comprised of two separate legal entities working together for mutual benefit: Orchard Hill College is a post-16 specialist provider and registered charity, while Orchard Hill College Academy Trust is a multi-academy trust.

This statement sets out Orchard Hill College & Academy Trust's (OHC&AT) 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 is written with reference to the Modern Slavery Act 2015 and relates to actions and activities during the financial year 1<sup>st</sup> September 2019 to 31<sup>st</sup> August 2020.

OHC&AT 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

This statement covers the activities of OHC&AT.

Orchard Hill College (the College) and Orchard Hill College Academy Trust (the Trust) together form Orchard Hill College and Academy Trust (OHC&AT), a family of specialist education providers for pupils and students from nursery to further education across London, Surrey, Sussex and Berkshire. Pupils and students within the OHC&AT family have a wide range of learning abilities and additional needs including complex autism; speech, language and communication difficulties; social, emotional and mental health; and physical disabilities including multi-sensory impairment and complex health needs.

OHC&AT is led by an Executive Senior Leadership Team (ESLT) comprising the CEO, Deputy CEO, Chief Finance Officer, Chief Operating Officer and the Principal of Orchard Hill College. The CEO holds ultimate responsibility for the active management of risk within the organisation, with functions and responsibilities delegated to ESLT members according to their specific remit and area of expertise.

The ESLT reports to a collaborated Board of Trustees which comprises the trustees of both the College and the Trust. The Board of Trustees has responsibility for overseeing risk management within OHC&AT as a whole.

### Countries of operation and supply

OHC&AT operates only in the UK.

## High-risk activities

Within the education sector, the areas typically seen as being at high risk of slavery or human trafficking are cleaning, catering and agency workers, due to the potential for companies to source cheap labour from countries at risk. Modern slavery also encompasses areas such as child criminal exploitation and child sexual exploitation, and thus has obvious safeguarding implications for the children and young people who attend OHC&AT academies and College centres.

## Responsibility

OHC&AT's anti-slavery initiatives include:

- Risk assessments: OHC&AT operates clear risk assessment and risk management processes across the organisation. Each school has a risk assessment system for all school-based decisions which may create a risk to the school. Due regard is always given to school-based decisions when recruiting and purchasing to consider the price versus quality. All schools are required to carry out a value for money statement when purchasing anything over £5k.
- Investigations/due diligence: any concerns regarding slavery or human trafficking would be brought to the attention of the relevant Principal, Director of Service or the Executive Senior Leadership Team (ESLT) depending upon the nature of the concern. This would then be raised with the relevant authorities via the Gangmasters & Labour Abuse Authority (GLAA).
- Training and awareness: the OHC&AT intranet, accessible to all staff, has various resources including posters, training videos and leaflets from the Department for Education (DfE), GLAA and the Association of Chartered Certified Accountants (ACCA). Those directly involved in the procurement chain will undertake appropriate and regular training and disseminate this as appropriate.

The notion and practice of safeguarding underpins diverse aspects of our practice as education providers. OHC&AT operates a comprehensive suite of policies and procedures intended to safeguard our pupils, students, staff and wider stakeholders from risks including those related to modern slavery.

Relevant policies include:

- **Whistleblowing Policy:** OHC&AT encourages all its staff, students and stakeholders to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for people to make disclosures, without fear of retaliation. Staff, students or stakeholders who have a concern regarding slavery or human trafficking can make a disclosure via our whistleblowing procedure and/or use the GLAA confidential helpline.
- **Staff Code of Conduct:** every member of OHC&AT staff is expected to uphold the highest standards of good conduct while carrying out their duties:

this means acting with integrity, professionalism, compassion and sensitivity in every aspect of their working lives.

- **Finance Regulations:** OHC&AT is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. OHC&AT works with suppliers to ensure that they meet the standards and improve their workers' working conditions. Serious violations of the way in which a supplier conducts their business arrangements could lead to the termination of the business relationship.
- **Recruitment & Selection Policy:** OHC&AT adheres to safer recruitment practices as laid out in Keeping Children Safe in Education (2019). When recruiting new staff, OHC&AT carries out all necessary pre-employment checks including identity checks and verifying a person's right to work. Additionally, OHC&AT uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. This is done as part of the 'new supplier' process and checking when we first engage with a recruitment agency. We specifically look at the 'top up' rates that an agency is deducting from a worker and seek declaration from the agency via a questionnaire.
- **Child Protection, Adult Protection & Safeguarding Policy:** modern slavery presents a variety of safeguarding risks to those involved, including (but not limited to) child criminal exploitation and child sexual exploitation as well as substance misuse, human trafficking and violence. As a family of education providers, OHC&AT operates clear and comprehensive safeguarding policies and procedures in line with national guidance and law. Every OHC&AT provision has a Designated Safeguarding Lead (DSL) who is responsible for managing all safeguarding and child protection/adult protection concerns within their school or College. DSLs receive regular supervision, training and support from the OHC&AT Director of Safeguarding & Learning Support. However, we adhere to the principle that safeguarding is everyone's responsibility and all OHC&AT staff receive regular, relevant training around both general and specific safeguarding issues, including risks associated with slavery and human trafficking and how to report any and all concerns.

## Due diligence

Our procurement team reporting into the Chief Finance Officer undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating a risk profile for each high risk supplier.

## **Performance indicators**

OHC&AT has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result OHC&AT:

- requires all staff working in procurement along with any other key purchasing personnel to have completed training on modern slavery by March 31<sup>st</sup> 2020;
- continues to develop a system for supply chain verification which is partially in place, whereby OHC&AT evaluates potential suppliers before they enter the supply chain; and
- continues to review and evaluate its existing supply chains, whereby OHC&AT evaluates all existing suppliers on an on-going basis but particularly as contracts become renewed and the preferred supplier list is collated.

We will use the following KPIs to measure how effective we have been to ensure slavery and human trafficking is not taking place within our organisation:

- Use of robust supplier selection process for new suppliers, including supplier questionnaires and compliance with our code of conduct;
- Requalification process for our existing suppliers deemed at risk, to include revised background checks and demonstration that the supplier has its own checks in place;

This will be reported to the Audit Committee on an ongoing basis on a % basis of checked suppliers and unchecked suppliers.

## **Training**

OHC&AT requires all staff within procurement and directly involved in the purchase chain, as well as HR staff, to complete training on modern slavery. This is also available to all OHC&AT staff via our online training provider (Educare).

For staff working in supply chain managers and HR professionals, OHC&AT's modern slavery training covers:

- our business'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 Licensing 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 OHC&AT 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.

### **Awareness-raising programme**

As well as training staff, OHC&AT has raised awareness of modern slavery issues by distributing HELP flyers and Gangland victim posters on our intranet, along with a resource section showing the DfE/GLAA video.

The posters and emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers 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.

### **POLICY REVIEW DETAILS**

|                                    |                                |
|------------------------------------|--------------------------------|
| <i>Version:</i>                    | 1.0                            |
| <i>Reviewer:</i>                   | Corrina Jenkins                |
| <i>Approval body:</i>              | Family Board                   |
| <i>Date this version approved:</i> | 25 <sup>th</sup> February 2020 |
| <i>Due for review:</i>             | Spring term 2021               |

### **RELATED POLICIES AND PROCEDURES**

Child Protection, Adult Protection and Safeguarding Policy  
Equality & Diversity Policy  
Staff Code of Conduct  
Whistleblowing Policy  
Recruitment & Selection Policy  
Risk Assessment Policy  
Risk Management Policy