MODERN SLAVERY STATEMENT

The OHC&AT Board of Trustees has agreed this Policy – 1st July 2022.

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.

The Modern Slavery Act 2015 defines offences as 'slavery, servitude and forced or 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.

This statement sets out Orchard Hill College & Academy Trust's (OHC&AT) actions and absolute commitment 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 1st September 2021 to 31st August 2022.

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, the Principal of Orchard Hill College and the Executive Director of Development. 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 contracted out cleaning and catering and the engagement of 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.

RISK ASSESSMENT AND MANAGEMENT

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 will 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 will 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), and it is the responsibility of Principals and senior leaders to ensure that these are disseminated as appropriate e.g. posters displayed around school or College premises. Those directly involved in the procurement chain will undertake specific appropriate and regular training and disseminate this as appropriate.

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

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 & Procurement Policy:** 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 (2021). 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, Wellbeing & 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.
- **London living wage** (LLW): ensuring that contractors' staff for outsourced services such as cleaning and catering are paid the LLW as a minimum.

DUE DILIGENCE PROCESSES

Our procurement team, reporting into the Chief Operating 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, service or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier and determining those which should be approached to complete the modern slavery questionnaire;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments, when necessary, which have a greater degree of focus on slavery and human trafficking where ~~general~~ specific risks are identified and seeking to mitigate the risks to the lowest acceptable level.

If OHC&AT determines that a supplier has breached, or is suspected of having breached, our requirements in relation to Modern Slavery Act compliance then we expect to remove them from our supply chain.

TRAINING ON MODERN SLAVERY AND TRAFFICKING

OHC&AT requires the following categories of staff to complete awareness training on trafficking and modern slavery:

- The Procurement team
- The HR team
- The Estates & Facilities Management team
- School Business/Office Managers
- Service Directors
- ESLT

This is also available to all OHC&AT staff via our online training provider (Educare).

Staff completing the awareness training will:

- understand what modern slavery and trafficking are;
- understand the different types of trafficking and modern slavery;
- recognise the main signs that indicate someone has been trafficked;
- know some basic information about the legal and policy context of trafficking in the UK and internationally;
- know what action to take if they know or suspect that someone has been trafficked.

Awareness-raising programme

As well as training our staff, OHC&AT has previously raised awareness of modern slavery issues by distributing flyers and posters to our sites.

The posters explained 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.

To ensure that the issue of modern slavery remains a focus and has the importance and prominence it deserves the following actions for OHC&AT will continue to be undertaken:

- The Procurement Team will issue the modern slavery questionnaire to any contractors deemed to present a risk and who have not been approached previously and review these
- HR will issue the modern slavery questionnaire to all recruitment agencies used by the organisation and review these
- The Head of Procurement will oversee the expansion of the Procurement Team's intranet page to include:
    - a specific section on modern slavery
    - resources (such as posters)
    - a link to the National Crime Agency which contains helpful videos
    - a link to Modern Slavery Helpline website
    - instructions on what to do if someone suspects modern slavery, for instance, reporting it to the Modern Slavery Helpline on 08000 121 700 or the police on 101.
- The Head of Training Partnerships, Research & Policy will ensure that all staff in the categories listed above have completed the online awareness training.

Progress on these actions will be reported to the Finance & Resources Committee on the next review of this Statement.

POLICY REVIEW DETAILS

Version:	2.0
Reviewer:	Geoff Hopper, Suzanne Hersey, Stuart Dixon
Approval body:	Family Board
Date this version approved:	1st July 2022
Due for review:	Summer 2023

RELATED POLICIES AND PROCEDURES

Child Protection, Adult Protection and Safeguarding Policy
Equality, Diversity & Inclusion Policy
OHC&AT Finance Regulations
Procurement Policy
Recruitment & Selection Policy

Risk Assessment Policy
Risk Management Policy
Staff Code of Conduct
Whistleblowing Policy