

# Modern Slavery and Human Trafficking Statement

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## Modern Slavery and Human Trafficking Statement

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## 1. Introduction

- 1.1 The Federation works primarily with UK-based suppliers and contractors and employees are protected under UK employment law laws and working time directives. Whilst the Federation does not conduct business in countries where there is a documented problem with human trafficking and / or modern slavery, we remain acutely aware of the need to ensure that companies within our supply chain share our commitment to treating employees fairly and ethically.
- 1.2 The Federation is committed to the highest standards of ethical conduct in all our activities and making continuous improvements in this area. We believe that there is a low risk of slavery or human trafficking having a connection with our activities.
- 1.3 This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking both within the Federation and our supply chains to ensure that the organisation is fully compliant with the Modern Slavery Act 2015.

## 2. Structure and Supply Chains

- 2.1 This statement covers the activities of the Harris Federation and all 48 Academies within the Multi Academy Trust. The Federation, is committed to giving young people an excellent education within a happy, caring and supportive environment.
- 2.2 Each Academy is led and run by its Principal and other senior leaders and has its own curriculum and way of doing things. Whilst there are Academies in many different settings, both inner city and suburban, they are predominantly within the London area.
- 2.3 The Federation educates 36,000 pupils and employs almost 4,000 teachers and support staff. The Federation's supply chains are drawn mainly from the catering, contract cleaning and education supply market.

## 3. Risk Assessment

- 3.1 The Federation has assessed the risks of modern slavery and human trafficking as follows:

### **High risk activities**

- The Federation do not believe there to be any high risk operations within the Federation or within their supply chain with regards to modern slavery and human trafficking.

### **Medium risk activities**

- Supply chains linked to the catering and cleaning provisions as a consequence of the Federation's use of external contractors.
- Supply chains linked to the manufacture of ICT equipment and school uniforms, as a consequence of the Federation's use of external suppliers to provide items and the likelihood that supplies are manufactured overseas.

### **Low risk activities**

- Provision of agency staff predominantly in teaching and support staff.

## 4. Policies on Modern Slavery

- 4.1 The policies we have in place and our anti-slavery statement, reflect our commitment 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 Federation or supply chains.

4.2 All policies are reviewed by senior managers and signed off by the Board, following (where appropriate) thorough consultation with all relevant stakeholders. Policies are reviewed on a rolling basis in response to longevity, statutory or regulatory change and Academy feedback.

## 5. Due Diligence processes

5.1 Federation Directors, Assistant Directors and Academy Principal, with assistance from the Governance and Compliance and/or Human Resources team are responsible for investigating any suspected instances of modern slavery and human trafficking.

## 6. Recruitment and Training of staff

6.1 The Federation operate a comprehensive and transparent recruitment and selection process, incorporating the provisions of the “Keeping Children Safe in Education” guidelines.

6.2 The majority of the Federation’s staff are employed directly on a permanent or fixed term basis. Those successfully appointed are sourced from multiple recruitment services which utilise a range of direct advertising, social media, databases and existing staff referrals, or via approved third party agencies.

6.3 In line with our commitments to safeguarding the Federation operates a preferred supplier group for employment agencies, with each agency agreeing to Terms of Business prior to any engagement. Agencies are selected based on their vetting policies, compliance processes, worker pay, and having a mandatory industry accreditation. Copies of the agency’s modern slavery statement are also requested. Those agencies selected to work with the Federation are reviewed regularly for best practice, and all new employment agencies wishing to be considered are reviewed annually against our requirements, before accepting workers from that agency.

6.4 All employees who join the Federation are subject to rigorous pre-employment checks to ensure they are genuine applicants operating as free agents with the required level of propriety. These will include verification of identity, references, evidence of qualifications, criminal record disclosure and right to work checks.

6.5 For roles covered by agency workers, the Federation will ensure that similar checks to those for employees are carried out. This is done by obtaining written verification from the agency that the checks have been conducted and the outcomes are satisfactory. The agencies themselves will have been subject to our rigorous supplier verification process which includes due diligence on their organisation.

6.6 **Fair Pay.** The Federation is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform. This is demonstrated through our commitment to ensuring staff receive, as a minimum, the National Minimum Wage, set annually by the government. This commitment means that all staff, whether employed directly, as contractors or through our sub-contractors, receive the appropriate National Minimum Wage.

## 7. Whistleblowing

- 7.1 The Federation 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 slavery or human trafficking. Our Whistle-blowing Policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

## 8. Measuring Effectiveness

- 8.1 The Federation strives to maintain the highest standards of employee conduct and ethical behaviour, and the 'Employee Handbook' sets out all of our employment policies and procedures. It includes our 'Code of Conduct', which makes clear to employees the actions and behaviours expected of them when representing the Federation.
- 8.2 Being aware of the contents of the 'Employee Handbook' is one of our mandatory policies, which we expect all employees to observe; every employee signs an annual declaration confirming their familiarity with our mandatory policies.

## 9. Procurement Practice

- 9.1 The Federation 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 working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- 9.2 The Federation will work with its key suppliers to ensure that they meet these standards, and any serious violation of Federation's standards will lead a review and possible termination of the business relationship.
- 9.3 All major supply contracts, notably, those identified as presenting a medium or high risk, are reviewed regularly with the results reported to the Trust Board to ensure that they are complying with the expectations of the Federation.
- 9.4 **Due Diligence.** The Federation operate a due diligence process in the tendering and appointment of suppliers. This 'Modern Slavery and Human Trafficking Statement' is published on the Federation's website. We request and review a copy of the same from our high and medium risk suppliers, as well as undertaking a number of due diligence checks on them which are in line with Public Contract Regulations 2015. For suppliers where there is deemed to be an additional risk of slavery or human trafficking, supplementary checks are completed.

## 10. Our Commitment

- 10.1 This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the Federation's Modern Slavery and Human Trafficking statement for the financial year ending 31 August 2020. It has been approved by the Trust Board, who will review and update it annually.

This document has been approved and signed by:

Date: 08 Jul 2020

**Sir Dan Moynihan**  
Chief Executive