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 2022 to August 2023.

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 21 schools serving the educational needs of circa 12,500 children and young people aged 3 to 19 and employing circa 2,050 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. The CLF 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 Deputy CEO , , Chief Operation Officer, Deputy Finance Director and HR Director are responsible for putting in place and reviewing policies and the processes 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:** Where a need for further due diligence or investigation are required, in relation to known or suspected instances of slavery and human trafficking relevant to their sphere of responsibility, these will be led and supported by Principals and their leadership teams, Designated Safeguarding Leads, the central professional services teams in accordance with CLF policies.

- **Training:** The Director of CLF Institute is responsible for delivering training solutions across the CLF, and works with the HR Director to ensure that training increases 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, in line with its funding agreement and the Seven Principles of Public Life (the Nolan Principles).
- **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 and have updated our procurement practices to include compliance with the Modern Slavery Act as a condition for all larger value contracts. The new supplier process includesa media and press background research to help identify any potential risks and a request that all suppliers must sign and confirm adhere to the Modern Slavery Act. Further scrutiny of suppliers that may be deemed to have a higher risk of non-compliance with the Act will be completed when identified. This updated process is reflected in the CLF Financial Regulations.

All suppliers were reviewed and reduced were possible as part of the implementation of a new finance system in October 2022. A Supplier Manager has been recruited to the finance team who will lead on supplier management including compliance checks and contract storage.

Training

The CLF requires all CLF Academy leaders, Operations Managers, Designated Safeguarding Leads, Finance professionals, Governance professionals and HR professionals to complete training as part of our annual training program. Our statutory and mandatory training alongside functional training for colleagues with specific responsibilities, cover modern slavery in a range of ways:

- Safeguarding and safer recruitment training:

- 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;

- Finance and procurement training:
  - 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;
  - 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 22nd June 2023 by the undersigned on behalf of the Cabot Learning Federation.

Steve Taylor, CEO