

# Transform Trust

## Modern Slavery Statement

### Introduction

### Voluntary Slavery and Human Trafficking Statement

Transform Trust is making a voluntary modern slavery and human trafficking statement relating to section 54 of the Modern Slavery Act 2015.

### About Us

Our annual turnover is under £36 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act 2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains.

The Trust works primarily with UK-based suppliers and contractors and employees are protected under UK employment law laws and working time directives. Whilst the Trust 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.

The Trust 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.

This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking both within the Trust and our supply chains to ensure that the organisation is fully compliant with the Modern Slavery Act 2015.

### Structure and Supply Chains

This statement covers the activities of Transform Trust and the 16 schools within the Trust. Transform is committed to giving children the best educational experience within a safe, caring and supportive environment.

Each school is led and run by its Headteacher or in some of our schools an Executive Headteacher and other senior leaders and has its own curriculum and operationally will make decisions on appointments and service provision. The Trust is based in Nottingham and all schools in the Trust are based in the East Midlands area.

The Trust currently has 5949 pupils and employs close to 900 staff who are teachers or support staff. Support staff includes class-based roles as well as office, midday and site staff.

The Trust and school supply chains are drawn mainly from the catering, contract cleaning and education supply market.

## **Risk Assessment**

The Trust has assessed the risks of modern slavery and human trafficking as follows;

High risk activities:

- Transform does not believe there to be any high-risk operations within or across the Trust 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 Trust's use of external contractors.
- Supply chains linked to the manufacture of ICT equipment and school uniforms, as a consequence of the Trust'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.

## **Policies on Modern Slavery**

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 Trust or supply chains.

All policies are written by those who have expertise in employment law and statutory regulations 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 school feedback.

## **Due Diligence processes**

Headteacher's or members of the Trust Executive Team, with assistance from Human Resources are responsible for investigating any suspected instances of modern slavery and human trafficking.

## **Recruitment and Training for staff**

The Trust operates a comprehensive and transparent recruitment and selection process, incorporating the provisions of the "Keeping Children Safe in Education" guidelines.

The majority of the Trust'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.

In line with our commitments to safeguarding the Trust 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 where relevant. Those agencies selected to work with the Trust

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.

All employees who join the Trust 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.

For roles covered by agency workers, the Trust 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.

### **Fair Pay**

The Trust 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. We always honour nationally agreed pay awards and meet national terms and conditions for our This commitment to pay at least the NMW means that all staff, whether employed directly, as contractors or through our sub-contractors, receive the appropriate National Minimum Wage.

### **Whistleblowing**

Transform 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 "Confidential Reporting Policy" is designed to make it easy for workers to make disclosures, without fear of retaliation.

### **Measuring Effectiveness**

The Trust strives to maintain the highest standards of employee conduct and ethical behaviour. Our employment policies and procedures include a Code of Conduct, which makes clear to employees the actions and behaviours expected of them when representing the Trust. All staff are expected annually to read and sign their acceptance of reading and noting the content of our Code of Conduct.

### **Procurement Practice**

The Trust 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.

The Trust will work with its key suppliers to ensure that they meet these standards, and any serious violation of the Trust's standards will lead a review and possible termination of the business relationship.

All major supply contracts, notably, those identified as presenting a medium or high risk, will be reviewed regularly with the results reported to the Trust Board to ensure that they are complying with the expectations of the Trust.

## Suppliers

The Trust operates a due diligence process in the tendering and appointment of suppliers. This "Modern Slavery and Human Trafficking Statement" is published on the Trust's website. We will 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 is 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.

## Our Commitment

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Transform Trust's Modern Slavery and Human Trafficking statement for the financial year ending 31 August 2019. It has been approved by the Trust Board, who will review and update it annually.

Signed:



CEO

11<sup>th</sup> April 2019.