

Modern Slavery Statement

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Policy creator:	Louise Rowe, HRBP
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Status:	Statutory

Introduction

In accordance with Section 54 of the Modern Slavery Act 2015, Westcountry Schools Trust (WeST) is committed to combatting and preventing modern slavery and human trafficking. This statement sets out the steps taken by WeST and its business units during the year ending 31st August 2020 to prevent modern slavery and human trafficking in its education arms, business units, and supply chains.

The COVID-19 circumstances have brought new challenges and this statement has been revised to reflect the developments in practices at WeST.

The HR Committee are the delegated authority with responsibility for governing this responsibility within the Trust. This statement has been approved by the HR Committee and is made pursuant to Section 54(1) of the Modern Slavery Act 2015.

Organisation

WeST is a growing family of schools formed around hubs in a multi-academy trust, each including primary schools, secondary schools, and higher education. WeST operates across the Southwest of the UK. Details of the specific learning units within the Trust is available from our website.

WeST holds a firm belief in giving each child every opportunity to learn and succeed in all that they do. Whilst we are a family of schools who share common values and beliefs, all our schools are unique and hold their own identity. We believe that by working collectively, sharing what works well and jointly developing best practice we are stronger together and can provide the very best education for our children. We have a pride in our schools, staff and children, and thrive on the constant challenge to do better. All our children are our collective responsibility.

We are committed to understanding modern slavery risks (including human trafficking) and ensuring that there is no modern slavery within our own establishment, or in our supply chains.

Due diligence in our supply chains

The Trust seeks excellence in every area of the organisation and strives to ensure the highest standards of professionalism, integrity, and ethical business practice. We are committed to conducting our business in a lawful manner and this includes engaging with our suppliers to ensure that they share our high standards.

We buy a range of external goods and services, including construction services and supplies, furniture and stationery, electronics, food and catering supplies, travel services, laboratory supplies, books, cleaning services, print and waste and recycling services and do so in accordance with public procurement law.

We expect our suppliers to fulfil their obligations to comply with the provisions of the Modern Slavery Act. Any new supplier will be asked to confirm that they meet the requirements of the Act.

During the COVID-19 circumstances we have maintained frequent communication regarding procurement orders and adapting to the evolving needs of the Trust.

We will continue to build upon our existing systems to identify, assess and monitor potential risk in our supply chains. The Trust reserves the right to exclude any bidder, contractor, or service provider who has been convicted of an offence under the Modern Slavery Act 2015.

Due diligence as an employer

Our HR team and associated support staff are trained to ensure, through our rigorous recruitment checks, that we do not employ people who are under-age or who do not have the right to work in the UK. Our employment contracts also adhere to the European Working Time Directive. These commitments are evidenced in the recruitment and selection policy.

During the COVID-19 pandemic, we have developed a supporting toolkit of materials for all units to use which facilitates virtual recruitment and selection processes and meet the adapted statutory guidance of right to work and other pre-employment checks.

Training and Policies

Reference to this statement will be included in the standard induction checklist for all new employees to ensure they are aware of this commitment.

Throughout the last year, various communications / activities have taken place to raise awareness with both colleagues and pupils/learners. Further communications / activities will take place through the coming year to build on this awareness. These provide opportunities to highlight issues of modern slavery and wider ethical considerations.

Information on modern slavery and human trafficking considerations is included in the child protection training completed by all employees.

The Trust operates a whistleblowing policy aimed principally at our employees but also available to our suppliers, which encourages the reporting of any wrongdoing which extends to human rights violations like modern slavery. Employees are responsible for ensuring they raise these matters at the earliest opportunity and in accordance with the specific procedure of the Whistleblowing Policy. All reports will be fully investigated, and appropriate remedial action taken. We aim to encourage openness and will support

anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our organisation or in any of our supply chains.

We have reviewed our existing policies and procedures in light of the Act. We are confident that our policies promote anti-slavery practices amongst our colleagues. The Trust implements several policies which help to support our anti-slavery stance, including:

- Recruitment and Selection Policy
- Code of Conduct, which includes information on gifts and hospitality
- Whistleblowing Policy
- Due Diligence Policy
- Scheme of Delegation for Governance

Further Steps

During the next financial year, the Trust will seek to develop:

- In the coming year our whistleblowing policy will be reviewed to ensure reference to the legislation and add clarification of how to draw attention to how to report concerns relating to modern slavery. This policy was due to be reviewed in the previous year however the review was delayed by the COVID-19 circumstances.
- We will continue to develop effective communications with our suppliers to confirm their understanding and compliance in line with our expectations.
- We will seek to develop internal audits and reviews of our control systems and procedures to ensure best practice and that they are effective in countering modern slavery.
- We will implement specific training on modern slavery risks for relevant groups of staff. This was due to be implemented in the previous year however was delayed by the COVID-19 circumstances and will be explored in the coming year.

We have discussed the Act, its purpose and the Trust's attitude to it at our Executive Team meetings. We have agreed to ensure the information is cascaded from the Executive Team to our teams and stakeholder and asked for them to consider where the risk of modern slavery or human trafficking may arise within the Trust.