

Human Trafficking And Modern Slavery Statement

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1. Introduction

- 1.1. This statement is made on behalf of OWN Trust and pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. This statement relates to actions and activities during the period April 2022 to March 2023 and is made in conjunction with the Academy Trust's (OWN) policy in relation to modern slavery with the aim of preventing opportunities for modern slavery to occur within its business or supply chain and safeguarding any customers who may be at risk. This statement and policy apply to all individuals working for or with OWN in any form, including our supply chain, contractors, employees and all other business partners.
- 1.2. OWN recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is committed to preventing slavery and human trafficking within its activities and to ensuring that its supply chains are free from slavery and human trafficking.
- 1.3. This statement sets out OWN's 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 business and supply chains.

2. Structure

- 2.1. OWN is a Multi-Academy Trust whose principle activities are the provision of primary education in 3 academies across Peterborough.

3. Our approach

- 3.1. OWN has a zero-tolerance approach to any form of modern slavery and trafficking. We are committed to acting ethically, with integrity and transparency in all business dealings and we

expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and deter modern slavery.

4. Our policies, documentation, and key relationships

4.1. The following key policies and documentation detail our approach to protecting our pupils and staff from modern slavery and ensuring our supply chains are free from modern slavery. These include:

- Equality & Diversity Policy;
- Safeguarding Children in Education Policy;
- Safer Recruitment Policy;
- Whistleblowing Policy;
- Financial regulations

4.2. In addition, we work closely with the National Joint Council (NJC) to help reduce risk by improving employee working and pay practices. Our Pay and Workforce Development Committee (PWD) has oversight of the process and practices embedded within OWN to reduce Modern Slavery and in ensuring our supply chains which rely on people can demonstrate adherence with local and national laws and regulations, including paying the minimum wage.

5. Identifying and addressing risks

5.1. We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact the organisation. The first is through matters of a safeguarding nature which covers child sexual exploitation or human trafficking which can directly impact our pupils. This also potentially affects the staff of our contractors. The second is our supply chain and the vendors we contract.

6. Procurement and supply chain

6.1. We are committed to ensuring that there is transparency in our business and our approach to tackling modern slavery is consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and we are evolving and updating our procurement and contracting processes to include specific prohibitions against the use of forced, compulsory and trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

6.2. The biggest risk to our organisation of falling foul of the Modern Slavery Act is through our procurement of goods and services. Whilst we cannot 100% guarantee supplier adherence

with the requirements of the Modern Slavery Act, we will endeavour to eliminate the risks as much as possible. We will do this by ensuring that our procurement processes, supplier code of conduct and contractual terms include specific provision relating to the Modern Slavery Act.

7. Safeguarding

- 7.1. Modern Slavery and trafficking are both forms of abuse and therefore our safeguarding policies and procedures should be followed. All frontline employees receive multi-agency Safeguarding Children training which incorporates modern slavery. These employees have an individual responsibility for ensuring that they are familiar with the signs and indicators and that they are aware of our Safeguarding policies and procedures so that they are able to respond appropriately. Line managers must ensure that safeguarding training is kept up to date.

8. Training for staff

- 8.1. Every member of staff, whether they are based in an academy or not, are trained on the policy. In addition, OWN Trust has a Whistleblowing Policy which enables those with concerns about any wrongdoing or breaches of law are able to raise these concerns in confidence without fear of disciplinary action.
- 8.2. We evaluate our processes for raising concerns to ensure that there are clearly identified ways to report concerns of whistleblowing or modern slavery which are available to all users of our estates.