

# Modern Slavery and Human Trafficking Statement

## Introduction

This statement sets out Transforming Education in Norfolk (TEN) 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 2018 to 31 August 2019).

As part of the education sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational Structure and Supply Chains

Transforming Education in Norfolk (TEN) is established as a charitable company limited by guarantee, with its affairs governed by its Memorandum and Articles of Association dated 16 May 2012 and amendments thereto. TEN is registered in England and Wales, company number 08070464, and registered with the Charity Commission under charity number 1148753.

TEN's Board of Trustees play a key role in setting the strategy for the Group and co-ordinates inter-institutional activities, standards and targets, as well as setting Group policies.

The educational providers in the TEN Group consist of:

- Norfolk Academies, a multi academy trust (a company limited by guarantee) managed by a Board of Directors and responsible for Wayland Academy Norfolk, Fakenham Academy Norfolk, Attleborough Academy Norfolk and Wayland Junior Academy Watton. Individual academies each have a local Academy Council in place, which collectively act in an advisory capacity to the Norfolk Academies Board.
- City College Norwich, a further and higher education corporation, managed by a Board of Governors.

In addition to the educational providers, the Group consists of:

- Norfolk Educational Services Limited, a company limited by shares, providing shared services within the Group, and managed by a Board of Directors.
- TEN Commercial Services Limited (TCS), a company limited by shares, providing services for customers outside of the group, and managed by a Board of Directors. TCS is currently not trading and is dormant.

TEN was established for the public benefit and for general charitable purposes according to the laws of England and Wales, and has the following objects:

- a) to advance, for the public benefit, education and training in Norfolk and elsewhere;
- b) to provide, for the public benefit, the best possible learning opportunities for students.

The TEN Group's supply chain is made up of a number of third party providers, many of which are procured through a recognised consortium for the education sector. The TEN Group procures a varied range of items to support educational activity – from text books to bricks. The TEN Group also procures a range of services such as cleaning and catering.

The TEN Group adopts a zero-tolerance approach to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our direct activity or in our supply chains.

The TEN Group currently operates only in the United Kingdom.

The following is the process by which the organisation assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

1. The TEN Group is a Living Wage employer and not only do directly employed staff receive the Living Wage but, when tendering for contracted out services, we also stipulate that these contractors must pay the Living Wage to its staff working at the TEN Group.
2. We have in place robust policies for Whistleblowing, Grievance and Dignity at Work and staff are aware of how to raise concerns in relation to any perceived wrongdoing or poor practices in the TEN Group.
3. We have a thorough procurement process and adhere to the European Public Contracts Directive.
4. All staff employed within the TEN Group or through contractors are subject to stringent pre-employment checks before they are able to undertake work for us.
5. The TEN Group will ensure that key staff undertake training on modern slavery, where deemed necessary.

### Supply Chain Management

The TEN Group sources a wide range of goods and services from suppliers based in the United Kingdom.

In all of its dealings with those suppliers the TEN Group strives to ensure that the highest ethical standards are reached at all times. As part of this ongoing requirement, there will be increased focus on the requirement for a long-term commitment by those suppliers to eradicate slavery and human trafficking in their own businesses and supply chains.

## Internal Auditing

An internal audit of all the TEN Group's direct suppliers has presented us with no immediate concerns. The vast majority of those suppliers are local to the TEN Group and have been assessed as posing minimal risk in terms of non-compliance with the Act.

## Responsibility

Responsibility for the TEN Group's anti-slavery initiatives is as follows:

**Policies:** The Information Compliance and Policies Officer is responsible for putting in place and reviewing policies and the process by which they were developed.

**Risk Assessments:** The TEN Group has a consistent approach to undertaking risk assessments and the Head of Professional Services is responsible for undertaking the human rights and modern slavery risk analysis.

**Training:** All staff who have responsibility for purchasing or authorising purchasing activity have undertaken training on modern slavery, where deemed necessary and are familiar with the relevant policies, set out below.

## Relevant Policies

The TEN Group 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:

- **Whistleblowing Policy:** The TEN Group encourages all its employees and contractors to report any concerns related to the direct activities of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Whistleblowing Policy is designed to make it easy for workers to make disclosures, without fear or retaliation. [Click here to view the policy.](#)
- **Procurement Policy:** The TEN Group is committed to ensuring that its suppliers adhere to the highest standards of ethics, and a review of its Terms & Conditions will be undertaken to ensure that existing suppliers are aware of their obligations under the Act and comply where necessary. 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. All new suppliers will be vetted for compliance with the Act as part of the due diligence process. Any supplier or potential supplier, that does not comply with the Modern Slavery Act 2015 will be removed from the TEN Group's list of suppliers. [Click here to view the policy](#)
- **Recruitment and Selection Policy:** The TEN Group uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Any member of staff

recruited through an agency will be subject to the full pre-employment checks required by the TEN Group before they can commence any work with the TEN Group. [Click here to view the policy.](#)

- *The TEN Group Financial Regulations:* The TEN Group Financial Regulations clearly state the requirements and process to be followed when entering into any agreement with suppliers. [Click here to view the regulations.](#)

## **Due Diligence**

The TEN Group undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The TEN Group's due diligence and reviews include:

- seeking confirmation from any potential supplier in the Standard Selection Questionnaire or Invitation to Tender document as to whether they are:
  - A relevant commercial organisation as defined by section 54 of the Modern Slavery Act 2015 ("The Act")?
  - If so, whether they are compliant with the annual reporting requirements contained within section 54 of The Act?
- mapping the supply chain broadly to assess particular produce or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier; and
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.

## **Performance Indicators**

The TEN Group has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring all staff who undertake purchasing activity on behalf of the TEN Group to have completed training on modern slavery;
- developing a system for supply chain verification whereby the TEN Group evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

## **Board Approval**

This statement has been approved by the Transforming Education in Norfolk Board who will review and update it annually.