

# Modern Slavery and Human Trafficking Statement

**Date:** November 2022  
**Revision:** A  
**Author:** Headteacher  
**Approved by the Board of Trustees:** November 2022

## Contents

1. Introduction .....	2
2. Structure and Supply Chains.....	2
3. Risk Assessment .....	2
4. Policies on Modern Slavery .....	2
5. Due Diligence processes.....	3
6. Recruitment and Training of staff .....	3
7. Whistleblowing.....	4
8. Measuring Effectiveness .....	4
9. Procurement Practice .....	4
10. Our Commitment .....	4

## **1. Introduction**

- 1.1 Huntcliff School works primarily with UK-based suppliers and contractors and employees are protected under UK employment law laws and working time directives. Whilst we do 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.
- 1.2 The School 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.
- 1.3 This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking both within Huntcliff School and our supply chains to ensure that the organisation is fully compliant with the Modern Slavery Act 2015.

## **2. Structure and Supply Chains**

- 2.1 This statement covers the activities of Huntcliff School and we are committed to giving young people an excellent education within a happy, caring and supportive environment.
- 2.2 Huntcliff School educates 560 pupils and employs 80 staff (teachers and associate staff). Our supply chains are drawn mainly from the catering, contract cleaning and education supply market.

## **3. Risk Assessment**

- 3.1 We have assessed the risks of modern slavery and human trafficking as follows:

### **High risk activities**

- We do not believe there to be any high-risk operations within Huntcliff School or within our 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 School's use of external contractors.
- Supply chains linked to the manufacture of ICT equipment and school uniforms, as a consequence of us using external suppliers to provide items and the likelihood that supplies are manufactured overseas.

### **Low risk activities**

- Provision of agency staff predominantly in teaching staff.

## **4. Policies on Modern Slavery**

- 4.1 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 Huntcliff School or supply chains.
- 4.2 All policies are reviewed by the Senior Leadership Team and signed off by the Board of Trustees, 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 feedback.

## **5. Due Diligence processes**

- 5.1 The Headteacher and the Senior Leadership Team, with assistance from the Trustees, Business Manager and Human Resources personnel are responsible for investigating any suspected instances of modern slavery and human trafficking.

**6. Recruitment and Training of staff**

- 6.1 Huntcliff School operate a comprehensive and transparent recruitment and selection process, incorporating the provisions of the “Keeping Children Safe in Education” guidelines.
- 6.2 The majority of our 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.
- 6.3 In line with our commitments to safeguarding Huntcliff School 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. Those agencies selected to work with Huntcliff School 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.
- 6.4 All employees who join Huntcliff School 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.
- 6.5 For roles covered by agency workers, we 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.
- 6.6 **Fair Pay.** We are 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. This commitment means that all staff, whether employed directly, as contractors or through our sub-contractors, receive the appropriate National Minimum Wage.

## **7. Whistleblowing**

- 7.1 We encourage all of our 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 [Whistleblowing Policy](#) (which can be viewed on our school website) is designed to make it easy for workers to make disclosures, without fear of retaliation.

## **8. Measuring Effectiveness**

- 8.1 Huntcliff School strives to maintain the highest standards of employee conduct and ethical behaviour, and all new members of staff are inducted using our Staff Induction Policy.
- 8.2 Staff are also informed of our school policies and procedures, information on these can be found in our centrally shared folder "Staff Handbook". Being aware of the contents of the Staff Handbook (folder) is mandatory. We expect all employees to observe; every employee signs an annual declaration confirming their familiarity with our policies.

## **9. Procurement Practice**

- 9.1 Huntcliff School 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.
- 9.2 We will work with its key suppliers to ensure that they meet these standards, and any serious violation of these standards will lead a review and possible termination of the business relationship.
- 9.3 All major supply contracts, notably, those identified as presenting a medium or high risk, are reviewed regularly with the results reported to the Trustee Board to ensure that they are complying with the expectations of Huntcliff School.

### **9.4 Due Diligence**

Huntcliff School operate a due diligence process in the tendering and appointment of suppliers. This 'Modern Slavery and Human Trafficking Statement' is published on the school website.

We 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 are 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.

## **10. Our Commitment**

- 10.1 This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Huntcliff School's Modern Slavery and Human Trafficking statement for the financial year ending 31 August 2022. It has been approved by the Trust Board, who will review and update it annually.