

<b>Policy title</b>	Modern Slavery and Human Trafficking Statement
<b>Written by</b>	Kelly Johnson, Director of Finance and CFO
<b>Policy owner</b>	Kelly Johnson, Director of Finance and CFO

<b>Status</b>	
<b>Summary of change</b>	NA

<b>Approval date</b>	19 <sup>th</sup> October 2023
<b>Approval authority</b>	Board of Trustees
<b>Review date</b>	Annually

## **1. Introduction**

- 1.1. This statement is made on behalf of the University of Brighton Academies Trust (UoBAT) (company number 7185046) and is issued pursuant to section 54(1) of the Modern Slavery Act 2015. The purpose of this statement is to outline UoBAT's commitment to preventing modern slavery and human trafficking within its own operations and supply chains.
- 1.2. This statement covers the period from August 2022 to September 2023 and applies to all individuals working for or with UoBAT in any capacity, including employees, contractors, suppliers, and business partners.
- 1.3. UoBAT recognises its responsibility to take a robust approach to combating modern slavery and human trafficking. We are committed to ensuring that our activities and supply chains are free from slavery, servitude, forced labour, and human trafficking. We believe in promoting ethical practices, integrity, and transparency throughout our organisation and expect the same from our business partners.

## **2. Risk assessment and management**

- 2.1. UoBAT acknowledges that modern slavery risks can manifest in various forms, both within our organisation and our supply chains. We are dedicated to understanding and addressing these risks effectively. Our risk assessment processes are designed to identify vulnerabilities and potential areas of concern, including safeguarding risks affecting our pupils and the staff of our contractors, as well as risks associated with our procurement of goods and services.
- 2.2. To mitigate the risk of modern slavery, UoBAT is committed to:
  - Implementing and enforcing effective systems and controls to prevent and deter modern slavery within our organisation and supply chains.
  - Collaborating with suppliers, contractors, and other business partners to ensure that they share our commitment to eradicating modern slavery and human trafficking.
  - Evolving and updating our procurement and contracting processes to include specific provisions against the use of forced, compulsory, and trafficked labour.
  - Encouraging our suppliers to uphold the same high standards by holding their own suppliers accountable for compliance with the Modern Slavery Act 2015.

## **3. Procurement and supply chain management**

- 3.1. A considerable proportion of our procurement is with suppliers who are pre-approved either by a purchasing consortium such as Crown Commercial Services (CCS) and Crescent Purchasing Consortium (CPC), or appointed through means of a formal tender process. Our supply chains include (but is not limited to):
  - Educational resources
  - Estate maintenance
  - ICT equipment

- Catering services and supplies
- Cleaning services and supplies
- Supply/agency staff
- Utilities
- Capital works

3.2. We have identified that some of our procurement takes place within sectors where modern slavery offences could occur, such as within our cleaning and catering supply chains and within the construction industry. We are committed to undertaking steps to promote awareness of this, these may include:

- Raising awareness of the Act amongst the Academies and Professional Services, with a particular focus on those with involvement in employment and procurement.
- Include compliance with the Modern Slavery Act and Living Wage Accreditation as a condition or criterion in specification and tender documents wherever possible.
- Ensure our supplier on-boarding process includes due diligence around adherence to the Modern Slavery Act 2015

#### **4. Policies and Procedures**

4.1. UoBAT has reviewed our existing policies and procedure in light of the Act. We are confident that our policies promote good behaviour among our colleagues. Our policies and procedures are kept under review to make sure that they reflect the changing needs to the Trust and of our staff, pupils and the communities we serve.

4.2. Among the policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act in UoBAT are:

- Standard Procurement Procedures
- Business Charge Card Policy
- Gifts and Hospitality Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Complaints Policy
- Child Protection and Safeguarding Policy
- Equality and Diversity Policy
- Recruitment Policy

#### **5. Training and continuing vigilance**

5.1. We have discussed the Act, its purpose and UoBAT's attitude to it at a Board of Trustees meeting. We have alerted the Executive Leadership Team to it and challenged them to continue to consider where the risk of modern slavery or human trafficking may arise within our organisation. We have provided guidance to our finance team and those involved in procurement of the need to avoid those risks and on possible indicators of them during the procurement of goods and services. We

will continue to enhance the assurances we seek from suppliers as to their avoidance of modern slavery and human trafficking.

## **6. Declaration**

6.1. This statement has been approved by UoBAT's Board of Trustees and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

### **Chair of University of Brighton Academies Trust Board**

**Name:** Professor Chris Pole

**Date:** 19<sup>th</sup> October 2023

### **CEO of University of Brighton Academies Trust**

**Name:** Dr John Smith

**Date:** 19<sup>th</sup> October 2023