

## **Bourne Education Trust Human Trafficking and Modern Slavery Statement 2019**

We are committed to operating responsibly and with high ethical standards, particularly with regard to human rights issues and will not tolerate human trafficking and other kinds of slavery within our operations. We expect equally high standards from our suppliers.

This is the second statement made on behalf of Bourne Education Trust pursuant to Section 54(1) of the Modern Slavery Act 2015. This statement sets out the steps that Bourne Education Trust has taken during the year ending 31 December 2019 to ensure that slavery and human trafficking is not taking place in any part of our business or that of its supply chain.

This statement includes all subsidiary organisations, namely: Auriol Junior School, Broadmere Primary School, Brookwood Primary School, Chertsey High School, Epsom & Ewell High School, Everest Community Academy, Jubilee High School, Matthew Arnold School, Meadow Primary School, New Monument Primary School, Pycroft Grange Primary School, Sayes Court Primary School, Sythwood Primary School, Teddington School, West Ewell Primary School and Woodmansterne Primary School and the Trust's trading subsidiaries (Bourne Education Trust Enterprises Limited and Matthew Arnold Enterprises Limited).

### **Organisational structure and supply chains**

We were established in 2011 with a vision to improve children's lives by 'Transforming schools; changing lives'. We have grown into a community of 16 schools in Surrey, Hampshire and the London Borough of Richmond upon Thames serving over 7500 pupils and 1000 staff. We want to create a community of outstanding schools with the highest aspiration and dedication to achieving the best outcomes for all our learners.

Core to our approach is a robust governance structure. We continue to build management capacity on Modern Slavery risk assessment across the Trust. The Headteachers of each school are supported by the Chief Executive Officer and Chief Operating Officer who are responsible for ensuring effective modern slavery risk assessment and due diligence activity. The CEO and COO meet monthly to ensure a consistent approach and to build understanding across the Trust.

In line with our values, Bourne Education Trust is committed to ensuring there is no modern slavery or human trafficking within any part of its business or supply chain.

### **Bourne Education Trust's principles**

Behaving in a principled, disciplined way is all part of being a responsible company. The success of our Trust is reliant on our people and the people we work with, including our suppliers and partners. Underpinning everything that we do are the Bourne Education Trust values and a culture where all of our employees embody our values. We expect all of our suppliers and partners to uphold these values.

- Openness to build trust, be transparent, sharpen accountability and drive improvement
- The operation of a simple efficient low-cost organisation
- The development of an effective and strong governance framework
- Tight control of our resources to achieve economies, efficiencies and effectiveness across our operation.

### **Risk Management**

As part of our initiative to identify and mitigate risk we have identified the principal areas which carry material risks. Bourne Education Trust ensures that suppliers are required to demonstrate their methods of corporate social responsibility during the tendering and selection process, details of which may vary according to the project. Suppliers to Bourne Education Trust are required to fully comply with the Modern Slavery Act 2015 and are confirming that they do so by accepting the Bourne Education Trust Terms and Conditions. Bourne Education Trust reserves the right to exclude any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

Additionally, we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.

### **Procurement and Supply chain management**

A considerable proportion of our procurement is with suppliers who are preapproved either by a purchasing consortium or appointed through means of a tender process. Our supply chains include:

- Education equipment, textbooks and resources suppliers
- Student and staff uniform suppliers
- Estate management maintenance and services
- ICT equipment and services
- Catering services and supplies
- Cleaning services and supplies
- Peripatetic music services
- Supply/agency staff.

We have carried out a risk assessment of our supply chain against the likelihood of the following 3 traits of slavery and human trafficking occurring:

- Forced labour
- Work and life under duress
- Impossibility of leaving an employer.

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 will be taking the following steps to promote awareness of this during 2020:

- Raise awareness amongst our academy-based teams involved in employment, procurement and management, of the risks of modern slavery occurring within our supply chains.
- Include compliance with the Modern Slavery Act as a condition or criterion in specification and tender documents wherever possible.
- Ensure our 'New Supplier' form requests all suppliers adhere to the Modern Slavery Act.
- Conduct a more in-depth review of our supply chains to better understand the risks of modern slavery occurring within them.
- Consider whether the appointment of a procurement officer role would enable us to better meet our obligations under the Modern Slavery Act

### **Our policies to resist modern slavery and human trafficking**

We have reviewed our existing policies and procedures in light of the Act. We are confident that our policies promote good behaviour among our colleagues at work and within Bourne Education Trust. Our policies and procedures are kept under review to make sure that they reflect the changing needs of Bourne Education Trust and of the staff, students/pupils and the communities it serves.

Among the policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act in Bourne Education Trust are:

- Code of Conduct
- Equality & Diversity Policy
- Fraud Policy
- Gifts, Hospitality & Related Party Policy
- Modern Slavery and Human Trafficking Policy
- Safeguarding Children in Education Policy
- Recruitment & Selection (incl. Safer Recruitment) Policy
- Whistleblowing Policy.

All our academies work towards educating others on slavery and human trafficking through:

- Educating pupils and students, for example through the History (slavery, and child labour) and Geography (human trafficking) departments in the secondary academies.
- Child protection / family support, where human trafficking has been highlighted as a high risk in some academies.

### **Our Employees**

There are currently over 1000 people employed by Bourne Education Trust. All new employees are subject to pre-employment checks to ensure their right to work in the UK and to confirm their identity. All employees are provided with information about their statutory rights, including: sick pay; holiday entitlements; parental leave; flexible working and any other benefits to which they may be entitled.

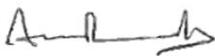
Bourne Education Trust pays all of our employees at least the minimum living wage and we ensure that our recruitment agencies comply with all legal requirements.

### **Training and continuing vigilance**

Raising awareness both internally and externally of the human rights aspects of slavery and trafficking is a fundamental step in preventing it occurring within our supply chain. Bourne Education Trust's next step is to ensure that all employees working in the following areas complete a training module by the end of 2020: Trust Board; Executive Team; commercial; contract management; procurement/supply chain management; senior management; facilities; human resources; internal audit; legal; operational management and procurement.

We have discussed the Act, its purpose and Bourne Education Trust's attitude to it at a meeting of the Board's HR & Remuneration Committee. 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.

This statement was approved initially by the Board of Bourne Education Trust at the meeting of the HR & Remuneration Committee on 25<sup>th</sup> March 2018 and was reviewed and updated by the Trust executive in May 2020.



Alex Russell, CEO