
Bourne Education Trust Human Trafficking and Modern Slavery Statement 2021

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 statement is 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 August 2020 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

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.

We continue to build management capacity on Modern Slavery risk assessment across the Trust. Core to our approach is a robust governance structure supported by the Head of Governance & Compliance. 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.

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.

Our 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 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

Our trustees and leadership team have formally identified and documented the major risks to which the Bourne Education Trust may be exposed. These risks are reviewed by the Trust Board, the Audit & Risk committee and the Trust's senior executive team and mitigation strategies are identified and implemented.

Our internal scrutiny programme, as well as our annual external audit, checks our compliance with policies and procedures. The internal scrutiny programme not only looks at financial policies and procedures but includes bespoke audits on non-financial areas. Any non-compliance or serious breach of policy is communicated to senior management and the Audit and Risk Committee.

Our children

Bourne Education Trust has a Child Protection and Safeguarding policy in place which focuses on the need to ensure that all children are safe, respected and valued. This policy and associated training ensure that our staff are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

Headteachers, together with Designated Safeguarding Leads, are required to ensure that staff and governors have at least annual safeguarding training and access to up to date information in relation to forms of neglect and abuse.

Our schools have processes in place to ensure that the voices of our children are heard and that they are able to voice any concerns they may have. If a child is persistently absent from school every school has a process to investigate the reasons for this and for ongoing monitoring.

One of the Trust's Executive Leaders acts as the Trust Safeguarding Lead and one of the Trustees has a nominated responsibility for safeguarding, reporting on a regular basis to the Trust Board. The Trust operates a cross Trust safeguarding team which advises on policy, practice and training and leads audits.

Our staff

Our overall aim is to ensure personal and professional development for all members of staff so that they have a rewarding and a fulfilling career within our community of schools and our aim is to have policies and procedures that support this ethos. We are committed to ensuring that all staff are treated with dignity and respect and carry out their role without any conflict or harassment. All new staff receive training on our policies and procedures and are required to read and sign our code of conduct. 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.

We adhere to the statutory requirements for certain recruitment and vetting checks and maintain a live Single Central Record of these checks. Our recruitment processes are set out in our Recruitment & Selection Policy and these ensure that all prospective employees are legally entitled to work in the UK. We undertake central audits of the Single Central Record.

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.

Whistleblowing policy

Our Whistleblowing policy encourages all individuals to raise concerns that they may have about the conduct or practices of others and sets out the procedure that should be followed. Our policy makes clear that individuals raising concerns will be protected.

Bourne Education Trust is committed to ensuring that any concerns of this nature are taken seriously and investigated.

Procurement and Supply chain management

A considerable proportion of our procurement is with suppliers who are standard industry suppliers, preapproved by purchasing consortia 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
- Supply/agency staff

We have carried out a risk assessment of our supply chain against the likelihood of the following three 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 continue with the work started last year to promote awareness of this.

Our current catering and cleaning contractors are required to check an individual's right to work in the UK and carry out a DBS check prior to hiring staff to work in our schools.

Over the next year, we will introduce a requirement to seek assurances in tenders for categories where it is applicable, such as catering, for potential bidders to declare whether they are a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act") and if they are compliant with annual reporting requirements under the same section. This will apply to all applicable categories for future tenders. We will work further in ensuring that Modern Slavery is reflected in all relevant policies. More detailed training will be implemented for key staff who are involved in procurement and contract management.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, for the financial year ending 31 August 2020.

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. Over the last year, Bourne Education Trust has focussed on ensuring relevant staff in the following areas complete a training module: Trust Board; Executive Team; commercial; contract management; procurement/supply chain management; senior management; facilities; human resources; internal audit; legal; operational management and procurement. As staff have changed this is subject to continuous review.

We have discussed the Act, its purpose and Bourne Education Trust's attitude to it at a meeting of the Board's Resources 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 25th March 2018 was reviewed and updated in May 2020 and June 2021. It will be next reviewed by the Trust's Resources Committee in Autumn 2021.

Kate Sanders, COO