



**MALBYLEARNINGTRUST**

Exceptional Experiences. Successful Lives.

# **MLT Modern Slavery and Human Trafficking Statement**

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**Responsibility for review of MLT Modern Slavery and Human Trafficking Statement –  
Strategic Director of HR, Payroll and Capital Resources – Reviewed annually.**

Date of Last Review: March 2024

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## INTRODUCTION

Maltby Learning Trust (MLT) is a Multi-Academy Trust and Sponsor, and acts as one employer across all the Academies, within the organisation.

The Trust is also an exempt educational charity, subject to company law and is a not-for-profit organisation. The Board of Trustees is the legal governing body of all Academies within the Multi-Academy Trust and remains accountable in law and to OFSTED and the Education and Skills Funding Agency for the exercise of its functions. Its Trustees, who are appointed on a voluntary basis, are drawn from the public and private sector, and bring significant educational and other professional expertise.

The Trust is committed to combatting modern slavery and human trafficking within the organisation and its supply chain and ensuring full compliance with the Modern Slavery Act 2015. The Trust is an equal opportunities employer, fully committed to creating and ensuring an inclusive and respectful working environment for all our staff to feel confident that they can report concerns without any risk to themselves.

## STRUCTURE AND SUPPLY CHAINS

The Trust is responsible for the leadership, governance and performance of a number of Academies. It seeks to deliver exceptional learning experiences that enable all young people to thrive in a competitive world and lead successful and fulfilling lives.

The Trust works primarily with UK based suppliers and contractors and employees are protected under UK employment law and working time directives. We remain aware of the need to ensure that the Trust and companies within our supply chain share our commitment to treating employees ethically and with integrity. When considering the organisation's activities, we believe that the risk of slavery and human trafficking is low.

## INDICATORS OF MODERN SLAVERY

The International Labour Office has identified four sets of operational indicators for adult and child victims of trafficking for labour and sexual exploitation. Each set is a structured list of indicators relevant to the following dimensions of the trafficking definition:

- Deceptive recruitment (or deception during recruitment, transfer and transportation)
- Coercive recruitment (or coercion during recruitment, transfer and transportation)
- Recruitment by abuse of vulnerability
- Exploitative conditions of work
- Coercion at destination.

A full list of the indicators under each heading can be found here: [wcms\\_105023.pdf \(ilo.org\)](#)

These indicators will be considered within the internal recruitment of staff to the workforce as potential indicators of previous Modern Slavery. They will also be considered within our Child Protection and Safeguarding procedures to identify children at risk of modern slavery.

## RISK MANAGEMENT

Risk management is embedded throughout the Trust's operations, with any risks identified and mitigations being shared with the Trustees through the Finance, Audit and Risk Committee (FAR). The Trust engages with an independent Internal Audit service who review and report on adherence to policies and procedures. Non-compliance, if identified, is reported to the Board of Trustees through the FAR committee.

The Trust has assessed its risks of modern slavery and human trafficking and has included below specific activities that may be considered as a risk to the Trust:

**High Risk** – Given the nature of the operations of the Trust, we do not believe there to be any activities that would constitute high risk either within the Trust or our supply chain.

**Medium Risk** – Supply Chains linked to the external provision of catering and cleaning. The supply of uniform where the contracted supplier uses an overseas company for manufacturing.

**Low Risk** – Contractors using subcontractors on large Capital projects. Risks are mitigated through the tender process.

## POLICIES AND PROCEDURES

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 our Trust. Our policies and procedures are kept under review to make sure that they reflect the changing needs of the Trust and of the staff, students and the communities it serves.

Among the policies and documentation that we consider key in avoiding modern slavery or human trafficking under the Act are:

- Code of Conduct
- Equality and Diversity Policy
- Financial Regulations
- Anti – Bribery Policy
- Gifts and Hospitality Policy
- Child Protection and Safeguarding Policy
- Safer Recruitment Policy
- Whistleblowing Policy.

## PROCUREMENT

We recognise that, as a purchaser of goods and services, we have the opportunity to influence good practices in the employment of people by other organisations. We do not enter into business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

We build relationships with our suppliers to ensure they understand our values and comply with our expectation and commitment to protect human rights and the environment. As part of our procurement processes, we require all our suppliers to comply with the requirements of the Modern Slavery Act. We have provided guidance to our procurement team on the need to avoid the risk of modern slavery and human trafficking and on the possible indicators that may arise during the procurement process. We have included within all tender documents the need for suppliers to report on whether they are compliant with the Act and as part of our due diligence we request copies of their Modern Slavery and Human Trafficking Statement. Where there is additional risk identified at the start of the tendering process additional checks will also be carried out.

We will continue to ensure that our suppliers always provide a safe working environment and act ethically. Where a high or medium risk was identified we will carry out a review during the contract to ensure the suppliers remain compliant. Where we feel, a supplier is not adhering to this Act, this could lead to the termination of a supplier's contract. This includes ensuring compliance with the government published National Living/Minimum Wage. We will continue to enhance the assurances we seek from suppliers as to their avoidance of modern slavery and human trafficking.

The Finance (Procurement) Business Partner approach implemented across the Trust has Finance/Procurement lead assigned for each Academy supported by a specific finance assistant. The remit of the business partner includes early engagement with potential providers and greater emphasis on supplier relationship management with the prevention of modern slavery being an objective.

## RECRUITMENT AND TRAINING

We have discussed the Act, its purpose and the Trust'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 in the Trust. All Senior Leaders and staff involved with procurement decisions have received training on modern slavery and this is refreshed bi-annually (annually for Trustees and staff involved in recruitment, procurement and financial management).

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. These include checks on identity, right to work in the UK, references, qualification and checks with the Disclosure and Barring Service. We must ensure that all applicants are genuine and acting freely. Similar checks are carried out when using Supply Agencies.