



## Modern Slavery and Human Trafficking Statement

### Introduction

This statement is published in accordance with S54 of the Modern Slavery Act 2015. It sets out Equals Trust's (The Trust) and its schools' statement for the year ending 31<sup>st</sup> March 2019. Equals Trust wishes to understand the potential modern slavery risks related to our education settings and supply chains and we want to put in place steps that are aimed at ensuring the prevention of slavery or human trafficking in our Trust schools and in our supply chains. Although Equals Trust is not legally required to produce a statement in relation to modern slavery and human trafficking as per the requirements of the Act; as a responsible and best practice employer we choose to do so voluntarily. This statement relates to actions and activities during the financial year 1<sup>st</sup> April 2018 to 31<sup>st</sup> March 2019.

### Our Trust Structure and Countries of Operation

Equals Trust formed in 2016 and provides Early Years Foundation Stage (EYFS) education, out-of-hours childcare and primary education to children as well as apprenticeship and teacher training opportunities. The Trust is the over-arching body responsible for:

- Burton Joyce Primary School
- Crossdale Primary School
- Cropwell Bishop Primary School
- Flintham Primary School
- Heymann Primary School
- Keyworth Primary and Nursery School
- Robert Miles Junior School
- Willow Farm Primary School
- Tollerton Primary School.

The Trust employs approximately 450 members of staff and has a turn-over of around £10m.

Equals Trust only operates within the United Kingdom although has relationships with schools in India, Japan and Tanzania. Whilst the risk of slavery and human trafficking is considered low, the Trust remains vigilant and will take all reasonable steps to manage the risks presented.

### Our Supply Chains

We are committed to engaging with suppliers to ensure they share the same high standards that we have as a Trust and we will not tolerate modern slavery or human trafficking in our supply chains. We buy a wide range of external goods and services,

for example: construction services and supplies, furniture and stationery, electronics, food and catering supplies, books, cleaning services and waste and recycling services. A large proportion (around 75% of all non-staffing expenditure) is bought from Nottinghamshire County Council who have their own robust policies and procedures with regard to modern slavery and human trafficking.

### Our Expectations of Suppliers to Equals Trust and its Schools

We expect our suppliers to fulfil their obligations to comply with the provisions of the Modern Slavery Act.

We expect our suppliers to agree and adhere to our ethical standards for conducting business. These standards require suppliers to:

- not hold any person in slavery or servitude or requiring a person to perform any form of forced or compulsory labour;
- not arrange nor facilitate the trafficking of people;
- not purchase materials or services from companies who use involuntary labour or participate in human trafficking;
- provide safe, hygienic, and healthy working environments for their employees;
- pay their employees, as a minimum, the national minimum wage; and
- act in accordance with applicable laws and regulations at all times

The Trust reserves the right to exclude any bidder, contractor or service-provider who has been convicted of an offence under the Modern Slavery Act 2015.

### Responsibility

Responsibility for the Trust's anti-slavery initiatives is as follows:

- **Policies:** The Trust Board, CEO, leadership team and Trust central team are responsible for ensuring appropriate recruitment and employment policies are in place and are reviewed as appropriate to ensure they remain current and relevant.
- **Risk assessments:** To be undertaken by the school or team area where there is deemed to be a risk of modern slavery or human trafficking, with the support of colleagues within the Trust central team. The risk assessment will be signed by the appropriate Head Teacher or the CEO; will be held centrally and will demonstrate the corporate responsibility for human rights and modern slavery risk analysis. No risk assessments have been deemed necessary this financial year.
- **Investigations/due diligence:** Any concerns regarding procedures or training about modern slavery or human trafficking should be raised with the Trust Human Resources Manager or Head Teacher.
- **Training:** To ensure a good level of understanding of the risks of modern slavery and human trafficking in our settings and supply chains we will provide training to our staff where relevant.

## Relevant Trust Policies

Equals Trust operates the following policies (which are regularly reviewed and updated) which aid our approach to the identification of modern slavery risks as well as steps we can take:

- **Whistleblowing policy:** Equals Trust encourages all its staff, stakeholders and other partners to report any concerns related to the direct activities or the supply chains of Equals Trust. This includes any circumstances which may give rise to a higher risk of slavery or human trafficking. The Trust's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct:** Our code of conduct makes it clear to staff the actions and behaviour expected of them when representing their school and the Trust. The Trust strives to maintain the highest standards of employee conduct and ethical behaviour in all its operations and when managing our supply chains.
- **Expectations of Suppliers:** Equals Trust is committed to using suppliers who adhere to the highest standards of ethics. Suppliers are expected to demonstrate, when asked, that they provide safe working conditions, that they treat workers with dignity and respect and that they act ethically and within the law with regard to their employees. If the Trust becomes aware of any serious violations of our supplier expectations, then this will lead to the termination of the business relationship.
- **Agency workers:** Trust schools use only professional, reputable employment agencies to source agency and supply staff. There has been no requirement to take action as a result of the risk of slavery and human trafficking in the period covered by this statement. We use three agencies for the procurement of supply teachers: Teacher Active, Connex Education and Textbook Teachers. All three agencies have their own modern slavery statement available to view on their website.

## Due Diligence

Equals Trust undertakes due diligence when considering tenders. Equals Trust's expectations with regard to suppliers are at Appendix 2. With future tender invites we intend to include the following statement:

***"Equals Trust is committed to ensuring that there is no modern slavery or human trafficking in our supply chains. We will not support or deal with any business knowingly involved in slavery or human trafficking"***.

## Guidance for Staff

Trust staff have been provided with a copy of the Trust's guidance in relation to modern slavery; what it is, how to identify it and how to report it. The guidance is attached to this report at Appendix 1.

## Next Steps

### Policies:

- When reviewing Trust policies, as part of the policy review cycle, we will ensure modern slavery and human trafficking risks are considered and minimised where possible.

### Suppliers:

- To include our 'supplier modern slavery statement' with all future tender information.
- To aim to risk-assess the Equals Trust preferred suppliers list in relation to modern slavery and human trafficking.

### Risk assessment:

- To continue to risk assess where there is deemed to be a risk of modern slavery or human trafficking in any area of our organisation.

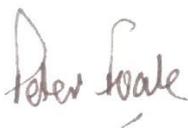
### Awareness, Training and Guidance

- To ensure all staff are notified about updated policies where these relate to helping to identify and prevent modern slavery and human trafficking risks.
- To ensure all staff receive a copy of the Trust's guidance on modern slavery and human trafficking.

## Trust Board Approval

This statement has been approved by the Board of Directors who will receive an annual review containing any updates in the relevant spring term meeting.

Signed:



Peter Foale

Chair of Equals Trust Board

Signed:



Phillip Palmer

CEO, Equals Trust

**27<sup>th</sup> March 2019**

## MODERN SLAVERY AND HUMAN TRAFFICKING

### Guidance

In the course of our employment with the Trust we may come across situations and people that cause us concern. This document seeks to give some practical guidance to Trust staff, Governors, other volunteers and Directors to assist with deciding if someone may have been trafficked or is the victim of modern slavery.

Victims are trafficked all over the world for little or no money – including to and within the UK. They can be forced to work in the sex trade, domestic service, forced labour, criminal activity or have their organs removed to be sold. There is no typical victim and some victims do not understand they have been exploited and that they are entitled to help and support. Victims are often trafficked to a foreign country where they cannot speak the language, have their travel and identity documents removed and are told that if they try to attempt an escape, they or their families will be harmed.

### Key indicators of trafficking include:

- Is the person in possession of their own passport, identification or travel documents or are these documents in possession of someone else?
- Does the person act as if they were instructed or coached by someone else?  
Do they allow others to speak for them when spoken to directly?
- Was the person recruited for one purpose and forced to engage in some other job?  
Have transport costs been paid for by facilitators, whom they must pay back through working or providing services?
- Does the person receive little or no payment for their work? Is someone else in control of their earnings?
- Does the victim have freedom of movement? Are they dropped off and collected from work?
- Is the person withdrawn or do they appear frightened?
- Has the person or their family been threatened with harm if they attempt to escape?
- Is the person under the impression they are bonded by debt, or in a situation of dependence?
- Has the person been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities
- Can the person freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?

This list is not exhaustive. Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of trafficking. Often you will build up a picture of

the person's circumstances which may indicate that something is not quite right. **If you have a suspicion, report it.**

## What should I do if I suspect someone is being trafficked or the victim of slavery?

In the first instance the point of contact for all modern slavery crimes should be the local police force. If you have information about modern slavery crimes – those who are committing such crimes or where victims are at risk that requires an immediate response **dial 999**.

If you hold information that could lead to the identification, discovery and recovery of victims in the UK, you can contact the **Modern Slavery Helpline 08000 121 700**.

For more information visit [www.unseenuk.org](http://www.unseenuk.org)

Alternatively, you can make calls anonymously to Crimestoppers on 0800 555 111

The Metropolitan Police with 'Stop the Traffik' have a 24-hour hotline for victims to call or to report suspected trafficking. The number is 0800 783 2589.

**For potential child victims of trafficking please call the Multi Agency Safeguarding Hub (MASH) on 0300 500 8090 or the NSPCC Child Trafficking Advice Centre on 0808 800 5000.**

Please contact the MASH to discuss your concerns under the adults safeguarding procedures on 0300 500 8080. For wider concerns about adults please call The Salvation Army 24-hour confidential Referral Helpline on 0300 3038151 anytime of the day or night to refer a potential adult victim of trafficking or to receive advice.

Out of office hours, you can contact the Emergency Duty Team on 0300 456 4546 Northern Ireland and Scotland:

Migrant Help - 07766 668781

Scotland: TARA - 0141 276 7724

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