



Modern Slavery Act Statement

(Financial year: 1st September 2022 to 31st August 2023)

November 2023

Contents

- 1 Introduction
- 2 Our Lady of Lourdes – Organisational Structure
- 3 Countries of Operation
- 4 Chains
- 5 Trust Policies
- 6 Risk Management
- 7 Actions taken this Financial Year/Next Steps

Trust Mission Statement

We are a partnership of Catholic schools.

Our aim is to provide the very best Catholic education for all in our community and so improve life chances through spiritual, academic and social development.

By placing the person and teachings of Jesus Christ at the centre of all that we do, we will:

- Follow the example of Our Lady of Lourdes by nurturing everyone in a spirit of compassion, service and healing
- Work together so that we can all achieve our full potential, deepen our faith and realise our God-given talents
- Make the world a better place, especially for the most vulnerable in our society, by doing **'little things with great love'** St Thérèse of Lisieux

Galatians 3:28

So there is no difference between Jews and Gentiles, between slaves and free people, between men and women; you are all one in union with Christ Jesus.

1 INTRODUCTION

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers and can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

Our Lady of Lourdes Catholic Multi-Academy Trust (“the Trust”) is committed to the highest standards of ethical conduct. This includes a commitment to prevent and eliminate any form of modern slavery and/or human trafficking in its business activities and its supply chain.

This statement sets out the steps the Trust has taken, during the **financial year ending 31st August 2023** to address the risk of modern slavery within our business activities and the steps the Trust will take, to combat modern slavery and human trafficking to address the requirements of the Modern Slavery Act (2015),

2 ORGANISATIONAL STRUCTURE

Our Lady of Lourdes is a Catholic Multi-Academy Trust was founded in 2018 under the Diocese of Nottingham and brings together 36 schools (30 Primary & 6 Secondary) across Nottingham City, Nottinghamshire, Derbyshire and Lincolnshire and has approximately 2000 employees.

The Trust is committed to providing the very best Catholic education and aims for its pupils and students to be happy, safe and inspired to flourish spiritually, socially and academically.

3 COUNTRIES OF OPERATION

The Trust only operate within England and our contractors and suppliers are predominantly UK based.

4 OUR SUPPLY CHAINS

The Trust's supply chain includes suppliers of educational materials, school uniforms, catering, maintenance, cleaning, furniture, equipment, stationery, ICT hardware, construction, consultancies and recruitment agencies.

The Trust works predominately with UK based suppliers and contractors whose employees are protected under UK employment law, although the Trust does not conduct business in countries where there is active human trafficking and / or modern slavery, the Trust is aware of the need to ensure that companies within our supply chain share our commitment to treat their employees in a fair and ethical way.

5 TRUST POLICIES

The Trust has the following policies which promote anti-slavery and human trafficking practices

- **Procurement Strategy/Policy/Financial Regulations** – Provides a framework of governance and steps to ensure all procurement activity is compliant to legislation and best practice including transparency of our supply base
- **Child Protection Policy and Safeguarding** – The aim is to provide a safe and secure environment for Children and provides a framework of our Schools to identify and support students who are at risk of modern slavery, trafficking or exploitation.

This legal requirement together with the Catholic values and principles that underpin the Our Lady of Lourdes Catholic Multi-Academy Trust mean that it is essential that the CMAT ensures not only compliance at local level but also assumes a strategic responsibility to ensure that safeguarding practices

are robust and effective in safeguarding and protecting the welfare of all children and young people in its care.

All schools within the Trust have a Staff Designated Safeguarding Lead and Designated Safeguarding Governor. Safeguarding is reported on at every Local Governing Body meeting, every Directors' Audit & Risk committee meeting and every Executive Board meeting.

The Trust follows each local authority's safeguarding procedures set up by the Local Safeguarding Children Board (LSCB). Child Protection & Safeguarding policies are based on the Department for Education publication "Keeping Children Safe in Education" and all employees are required to read and understand this document as well as undertake annual Safeguarding refresher training.

- **Safer Recruitment and Selection Policy** – To ensure staff that are recruited to the Trust are subject to rigorous statutory checks. Where agency staff are used, only reputable agencies are allowed on our approved supplier base and are subject to mandatory due diligence checks.
- **Whistleblowing Policy** – This policy provides a mechanism for encouraging employees to report concerns about potential wrongdoings, including modern slavery risks, without fear of reprisals, victimisation or subsequent discrimination. It is intended to encourage and enable employees to raise serious concerns within the Trust. It is recognised that cases may have to proceed on a confidential basis. The Whistleblowing Policy is extended to enable Governors, Volunteers and Contractors/Suppliers to also voice their concerns.

6 RISK MANAGEMENT

Risk management is embedded in the day-to-day practice within Our Lady of Lourdes Catholic Multi-Academy Trust. Potential risks have been identified and documented and are reviewed regularly by the CEO, Directors' Audit & Risk Committee and the Executive Board as a whole to ensure continuous compliance and improvement.

The Trust is committed to ensuring the safety of pupils, students and employees and has in place appropriate strategies, policies and procedure to help mitigate against risk.

We are confident that, by working together with our suppliers, we can aim to ensure that they adhere to the same high standards in the prevention of slavery and human trafficking.

7 ACTIONS TAKEN THIS FINANCIAL YEAR

- The Trust is committed to following national terms and conditions for its employees as part of the Trust's pay structure and in its relationships with partners
- Ongoing: Arrangements are in place to embed best practice procurement principles and supply chain management within the Trust business activities
- Ongoing: Trust-wide Employee Code of Conduct to assist in the prevention of slavery and human trafficking.
- Ongoing: Centralisation of Finance and HR Services allowing data to be accessed centrally.
- Ongoing: Trust-wide Risk Register in place and reviewed regularly by CEO/Audit & Risk Committee/Executive Board
- Ongoing: Centralised procurement of high-risk contracts to limit risk and exposure to suppliers and contractors operating outside of this policy
- Ongoing: As part of a review, develop supplier approval and due diligence processes, request that potential suppliers declare that their supply chains are free from slavery and human trafficking. This is reviewed regularly as part of our Procurement Policy in line with guidance set out from ESFA/Finance Regulations Manual.
- Ongoing: As part of our recruitment processes, safer recruitment procedures are in place

NEXT STEPS

- Procurement:
 - Full supplier base review, to reduce active suppliers through consolidation and improved supplier management.
 - Embed supplier codes of conduct through improved supplier management and mandatory supplier due-diligence processes
 - Develop robust supplier monitoring processes in sectors that are at high risk of Modern Slavery through improved contract management
 - Procurement and Supplier/Contract Management Training to all buying teams to cover Modern Slavery Legislation
 - Develop measures to test the effectiveness of the supplier management processes and related policies.

Ratification Date	30 th November 2022
Date of Review	Annually - Nov 2023
Date of Next Review	Nov 2024
Reviewer	OLoL Finance & Estates Committee / OLoL Exec Board
Authors	Tamer Robson/Daniel Moore/Mary Robson/