

THE NEWMAN CATHOLIC COLLEGIATE



Modern Slavery Statement and Policy

Approved by:

Date:

Last reviewed on:

June 2024

Next review due by: June 2025

Introduction

The Newman Catholic Collegiate is committed to preventing slavery and human trafficking in its activities, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The collegiate have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, governors, senior leaders, teaching staff, support staff, agency workers, volunteers, contractors, external consultants and third-party representatives.

Organisational Structure and Supply Chains

The Newman Catholic Collegiate is currently a group of nine Catholic schools across North Staffordshire which includes:

- Our Lady of Grace Catholic Academy
- Our Lady & St Benedict Catholic Academy
- St George & St Martin Catholic Academy
- St John the Evangelist Catholic Academy
- St Joseph's Catholic Academy
- St Margaret Ward Catholic Academy (Secondary)
- St Mary's Catholic Academy
- St Peter's Catholic Academy
- St Wilfrid's Catholic Academy

The collegiate was formed in 2013 and currently educates over 2,800 pupils and employs over 400 staff. The collegiate is governed by a Board of Directors who set the strategic direction. The Catholic Senior Executive Leader and the Executive Team are tasked with leading and managing the business as a whole and ensuring that the collegiate complies with all laws, regulations, and statutory guidance relevant to the running of the collegiate, both centrally and at local academy level.

As a Catholic group of academies, the basis of our mission is to value and respect every person as an individual made in the image of Christ.

As the collegiate is a charity, procurement of quality goods and services is an important part of ensuring charitable funds are carefully and correctly spent. Supply chains utilised by the collegiate currently include education, catering, cleaning, furniture and equipment, ICT hardware and maintenance. The collegiate has considered which of its supply chains could be at a high risk of slavery or human trafficking. Regard was given to supply chains which are high risk, originate outside the UK, and identifies high risk supply chains for schools as catering, cleaning and furniture and uniform manufacture.

Due diligence and managing risk

As part of the collegiate work to identify and to mitigate the risk of modern slavery occurring in any part of its business, the collegiate adopts due diligence through our system of internal control and Risk Management Framework. Through our policies, collegiate risk register and through risk registers in each academy, we ensure strategic and operational oversight of risk and can assess and mitigate the likelihood and impact of risks occurring in our procurement of supplies and services, and in safeguarding across the collegiate.

At each Board and subcommittee meeting the Directors hold the Executive Team to account for identifying, preventing and managing risk, giving assurance to the Board on a regular basis that planned mitigations are robust and efficient. The Risk Management Framework is designed to enable the collegiate to meet its objectives effectively and enable all staff to understand how risk management is embedded across to protect and support pupils, staff and assets held by the collegiate, reducing the cost of risk to the collegiate.

To identify and mitigate the risk of slavery and human trafficking in supply chains, the collegiate will carry out stringent due diligence on new suppliers. This includes:

- Obtaining general information on supplier companies and understanding their corporate structure.
- Assessing supplier financial stability by reviewing recent and previous company accounts.
- Ensuring suppliers can provide adequate assurances of their own commitment to preventing modern slavery and human trafficking.
- Ensuring suppliers can provide relevant health and safety checks.
- Ensuring suppliers on framework contracts are quality assurance compliant particularly in relation to working conditions and people.
- Obtaining details of supplier policies for the purchase of consumables.

Procurement and Supply Chain Management

The collegiate procurement policy sets out the requirements we have in relation to our engagement with suppliers. Our suppliers are expected to comply with all local and national laws and regulations.

Procurement is subject to internal audit review, as well as assessed by our external auditors annually. Frameworks via public sector buying organisations are considered for tenders to provide assurance that the collegiate can meet the requirements of the Modern Slavery Act (2015) by default. In the event we opt not to use an existing framework, all tenders go through the Executive Team at which point the modern slavery risk will be considered and incorporated into the evaluation criteria.

The collegiate will seek to contract with suppliers within the UK, however, on rare occasions some suppliers and services may only be procured from global suppliers. The collegiate aims to reduce its carbon footprint overtime, including but not limited to reducing the carbon footprint within our supply chains.

Safer recruitment and safeguarding practice

The collegiate is committed to establishing the highest quality of safeguarding practice and promoting the welfare of staff, pupils, and volunteers by ensuring full compliance with all statutory duties set out in the DfE Keeping Children Safe in Education (KCSIE), and other required legislation such as that for health and safety in the workplace.

The collegiate reviews the Safeguarding Policy annually and this is approved by the Board. All academies have a Designated Safeguarding Leader (DSL). The DSLs undertake regular training both within the collegiate and through partnership work with the local authority. The safeguarding leads meet share best practice with colleagues across the collegiate.

The Catholic Senior Executive Leader and Executive Team are held to account by the Board for safeguarding across the collegiate. A nominated director meets with the CSEL and safeguarding link governors to secure a good understanding of key issues in safeguarding both internally and in relation to factors externally in the community that may impact upon staff and pupils. On each Local Governing Body (LGB) there is a named safeguarding governor who will support fellow governors in reviewing how well the academy is meeting statutory duties in safeguarding pupils and supporting the welfare of staff and pupils.

The collegiate operates safer recruitment practices in accordance with the statutory guidance. In recruiting temporary staff through supply agencies all vetting, pre-employment checks and onboarding prior to commencing work must be in place, deterring those who wish to exploit persons for trafficking and modern slavery.

Trust Policies

The following key policies detail our approach to protecting our pupils and staff from modern slavery and ensuring our supply chains are free from modern slavery.

- Tendering Policy
- Charging & Remissions Policy
- Complaints Policy
- Whistleblowing Policy
- Grievance Policy
- Single Central Record (SCR), Personnel Files and Safer Recruitment Policy
- Safeguarding Policy
- Code of Conduct

Future Steps

In developing our practice in the following financial year, 2024-2025 we will:

- Enhanced due diligence, specific to slavery and human trafficking.
- Enhanced due diligence on existing suppliers, rather than on new suppliers only.
- Proactive engagement with high-risk suppliers to obtain more detail on the entire supply chain.
- Staff training to raise awareness of slavery and human trafficking, especially from a procurement and employment perspective.
- Increased use of ethical suppliers.
- Continue to review our current policy framework and policies to ensure we continuously reduce the risk of modern slavery.

The Trust makes this statement pursuant to section 54(1) of the Modern Slavery Act 2015.