Modern Slavery Statement

1. Introduction

1.1 The Two Counties Trust is committed to the highest standards of ethical conduct in all of our activities. The Trust will not engage in, or condone, the practices of human trafficking, slavery or forced labour.

2. About The Two Counties Trust

2.1 The Two Counties Trust is a family of academies with a shared ethos, common values and collective goals. The Trust was formed in 2016 and employs over 1,000 staff.

2.2 As a Trust, our students are at the centre of our vision. We endeavour to raise the educational standards and better students' life chances by working in partnership to support and challenge all our schools to continually improve.

2.3 The Trust has a clear mission, which is to transform the lives of children and young people and to release their potential through excellent education and the opportunity to acquire new skills.

2.4 All schools within the Trust are united in their vision to rapidly improve the learning experience of their students and raise the aspirations of the local communities that they serve.

2.5 As a Trust, we work together so everyone can succeed with the following Core Values:

Respect for Individuals
We work together to create a culture based on trust, respect and dignity.

Integrity
We are open, honest and direct in our dealings.

Collaboration
We know that there is strength in working together, communicating, sharing ideas and best practice and finding more efficient and effective ways to deliver our objectives.

Continual Improvement
We are a learning organisation that strives always to 'make our best better'.

Accountability
We hold ourselves accountable and take ownership.

3. Risk Management

3.1 Senior Leaders and Trustees have identified and documented the major risks to which the Trust is exposed. These major risks are reported to and reviewed by the Risk and Audit Committee regularly. Risk management strategies have been implemented.

3.2 All Headteachers complete a risk register annually. Given the nature of our organisation a risk review of the protection of employees and students is included in our risk register in order to identify risk factors and minimise risk by taking preventative action. The Trust has robust procedures in place for staff and students which minimise any potential risk and is committed to continuous review and improvement in this area.

3.3 The Trust carries out internal and external audits which include policy compliance. The outcomes of these audits are included in reports to Headteachers, the Risk and Audit Committee and to the Board of Trustees.

4. Child Protection and Safeguarding

4.1 Our environment is safe and secure for students, staff, volunteers and visitors. The Trust is committed to ensuring our students feel safe and are safe. We promote a climate in each of our schools where staff or students can feel confident to raise any concerns that they may have about their own welfare or the wellbeing of others.

4.2 All schools within The Two Counties Trust have a Safeguarding and Child Protection policy, which is reviewed annually. These policies provide a framework for our schools to develop secure processes for identifying and supporting students who are at risk.

4.3 Each policy specifically identifies trafficking within its guidance and includes links on the steps to take when trafficking is suspected.

4.4 Governors, Headteachers and Designated Safeguarding Leads ensure that all staff and governors are provided with safeguarding training that is updated annually and that briefings are provided regularly to ensure access is available to up to date information.

4.5 All schools within the Trust have processes in place to ensure that the voice of the student is heard and there are routes to disclose any concerns that they may have.

4.6 If students are persistently absent from school the reasons for this will be investigated.

4.7 Each school has a Designated Safeguarding Lead and a Deputy Designate Safeguarding Lead. Safeguarding procedures are overseen at by a member of each Local Governing Body. The Trust has also established a network of Designated Safeguarding Leads from each school who meet regularly to review and continually develop safeguarding practices.

5. HR policies

5.1 The Trust expects all employees to portray the best standards of personal and professional conduct and the expectations are contained within the Code of Conduct, which is provided to all employees within our schools on appointment and annually.

5.2 The Trust is committed to a culture that promotes equality and diversity and stimulates a positive working and learning environment with a shared sense of belonging for all who work, learn and use the services of our schools. The Trust is committed to equality and values diversity and we recognise that the strength of the Trust is built on the understanding of individual strengths and differences and respecting these differences.

5.3 The Trust has a zero tolerance to bullying and harassment and is committed to enabling all employees to work without fear and be treated with dignity and respect. Employees must be able to carry out their role free from conflict, risk, harassment or any other behaviour which is compromising, demeaning or demoralising.

5.4 The Trust has a number of HR policies in place including an Equality and Diversity policy and an Anti-bullying and harassment policy that ensure that this ethos is put into place. All Trust policies are available on the website. www.twocountiestrust.co.uk

5.5 The Trust has a statutory responsibility to ensure all member schools undertake specified recruitment and vetting checks on individuals working within their organisation and for schools to maintain an up to date and accurate Single Central Record of these checks. All schools within The Two Counties Trust, and the central office, are able to demonstrate that vetting checks, including the right to work in the UK, have been carried out for all staff.

6. Whistleblowing policy

6.1   The Trust's Whistleblowing policy applies to all employees and encourages them to raise a concern including, but not limited to, criminal offences, a miscarriage of justice, creating a risk to health and safety, causing damage to the environment, breach of a legal obligation or concealment of any of these matters.

6.2   The Trust's policy sets out a process for reporting these concerns and provides protection for individuals making a disclosure. The Trust takes any acts of wrongdoing, malpractice or dangers in relation to matters of public interest very seriously and will investigate all complaints made under the whistleblowing policy. The policy is published on our website and therefore available to the widest potential audience.

7. Procurement

7.1   **A** considerable proportion of our procurement is with suppliers who either are pre-approved by a purchasing consortium or are appointed by means of a tender process.

7.2   We have identified that some of our procurement takes place within sectors where modern slavery offences could occur such as within our catering and school uniform supply chains.

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

7.3   When one of our schools is selecting a new school uniform supplier we will consider the supplier's ethical trading policies and review their code of conduct for suppliers as part of the tender and selection process.

7.4   Where new suppliers are required, the Trust undertakes due diligence and will include compliance with the Modern Slavery Act as a condition or criterion in tender documents wherever possible.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act (2015) and constitutes The Two Counties Trust slavery and human trafficking statement for the financial year ending 31st August 2018.

Signed ---   Date   -----------------------------

Karen Potts
Chair of Trustees