Modern Day Slavery Statement

Introduction

GLF Schools acknowledges its responsibility to comply with all principles of the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking within its activities, as well as ensuring its supply chains are free from slavery and human trafficking.

This statement sets out the Trust's actions to understand all potential modern slavery risks related to its activity and to put in place measures that aim to ensure that there is no slavery or human trafficking in its schools and supply chains. This statement relates to actions and activities we will be undertaking during financial year 1 September 2023 to 31 August 2024.

Organisational structure and supply chain

GLF Schools was founded in 2012 as a Multi Academy Trust and is classed as a charitable company limited by guarantee. As of 1 January 2024, GLF comprises 35 primary schools, 7 secondary schools and a central team that serves our schools. Our 42 schools are located across seven local authorities (Surrey, Croydon, West Sussex, Oxfordshire, Wokingham, Hampshire and Wandsworth). GLF schools has around 2,500 employees and an annual turnover of £115m for the year ended 31 August 2023, and all our operations are based in the UK.

We have a simple mission: "We exist to serve our communities by providing all children and staff the opportunity to grow, to learn and to flourish". This is supported by our core values of '**Respect, Inclusivity, Integrity and Kindness**'. Each of our schools has its own distinct character and culture which is respectful of its community and context, but their utmost common ground is that it is our people that make each school. Our collective GLF culture is built upon caring for our children and students by enabling our people to provide the best possible education with the resources at our disposal.

Our suppliers are mainly UK based though we do have some non-UK based IT suppliers such as cloud services. Our key supply areas include catering, cleaning, maintenance repairs, staffing agencies and learning resources.

Our policies to resist slavery and human trafficking

We have a robust process in place to regularly review our policies and procedures, with such review having regard to the Modern Slavery Act. Among the policies which demonstrate our commitment to avoiding modern slavery or human trafficking are:

- Child protection and safeguarding policy
- Safer recruitment policy

- Staff code of conduct
- Anti-fraud and anti-bribery policy
- Gifts & hospitality policy
- Procurement policy
- Whistleblowing policy
- Equalities and Diversity policy, as well as the Trust's Equality & Diversity strategy which includes the roll out of staff network forums

We have a recognition agreement with the main teaching and associate staff unions which allows us to work closely with these organisations to continuously explore ways to improve employee working and pay practices.

Our policies demonstrate our commitment to act ethically and with integrity throughout our organisation, in line with our core values.

Our whistleblowing policy will be amended to draw attention to the risk of modern slavery or human trafficking and to stress that a report of concern in relation to those matters can be made under the protection of the whistleblowing policy.

Our due diligence: procurement and supply chain management

The majority of our procurement is with suppliers that are on pre-approved frameworks or appointed via a formal tender process. Our supply chains include:

- Construction
- Estates maintenance and services
- Learning resources for our children
- IT equipment and services, including software
- Catering services and supplies
- Cleaning services and supplies
- Staffing, via supply agencies or specialist organisations
- Uniform suppliers

We have identified that some of our procurement is within categories where modern slavery offences occur, such as the construction industry and within catering, cleaning, IT and school uniform supply chains. During this academic year our due diligence will include:

- Our current catering and cleaning contractors are already required to check an individual's right to work in the UK and carry out a DBS check prior to hiring staff to work in our schools.
- In any tenders for categories where it is applicable, such as catering, we will ask potential bidders whether they are a relevant commercial organisation as defined by section 54 ("Transparency in supply chains etc.") of the Modern Slavery Act 2015 ("the Act") and if they are compliant with annual reporting requirements under the same section. The question is subject to Pass / Fail scoring therefore any organisation that answers no to either of the questions are excluded from tenders. This will apply to all applicable categories for future tenders and frameworks we use are already compliant with this requirement.
- We will continue to raise awareness of the risks of modern slavery occurring within our supply chain with all colleagues involved with procurement and contract management

- Ensuring our on-boarding process for new suppliers, within high risk categories, includes due diligence around adherence to the Modern Slavery Act 2015
- Ensuring that our standard terms and conditions include a requirement for compliance to the Modern Slavery Act 2015

Risk management

Our trustees and leadership team have formally identified and documented the major risks to which GLF Schools may be exposed. These risks are reviewed by the Trust Board and relevant committee, the Trust's leadership team and the Audit & Risk committee and mitigation strategies are identified and implemented.

Our internal scrutiny programme, as well as our annual external audit, checks our compliance with policies and procedures. Any non-compliance or serious breach of policy is communicated to senior management and the Audit and Risk Committee.

We participate in the unions' Valued Worker Scheme which provides an external accreditation of our employment practices.

Training and continuing vigilance

Our Modern Slavery Statement is discussed and approved annually by our Trust Board, and our Board are aware of their responsibility to ensure that the Trust takes appropriate actions to avoid modern slavery or human trafficking.

All staff receive annual training on our Child Protection and Safeguarding policy, which focuses on the need to ensure that all children are safe, respected and valued. This policy and associated training ensure that our staff are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. The policy identifies modern slavery as a form of harm and provides guidance for staff who believe a child is at risk of harm.

Our schools have processes in place to ensure that the voices of our children are heard and that they are able to voice any concerns they may have. If a child is persistently absent from school every school has a process to investigate the reasons for this and for ongoing monitoring.

GLF schools employs a Trust Safeguarding Lead and one of the Trustees has a nominated responsibility for safeguarding, reporting on a regular basis to the Trust Board which includes reference to modern slavery. The Trust operates a strategic safeguarding team which advises on policy, practice and training and leads audits.

Staff are asked to refresh their knowledge of other key policies including the staff code of conduct and whistleblowing on an annual basis.

We have no incidences to date of concerns being raised regarding modern slavery or human trafficking via our whistleblowing policy, from law enforcement agencies or from our own due diligence processes during procurement.

Declaration

This statement has been approved by GLF Schools' Board of Trustees and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Chair of GLF Schools Trust Board	CEO of GLF Schools
Lynne O'Reilly	Julian Drinkall
9 February 2024	9 February 2024

Signatures not published online for security purposes.