



OCL Modern Slavery and Human Trafficking Statement

Introduction

Oasis is a global movement of volunteers, activists and professionals working to build stronger, more inclusive communities. We achieve this through our family of organisations delivering education, housing, youth work, anti-trafficking initiatives, community services and social justice programmes across the UK and internationally. Today, Oasis operates in more than 50 local neighbourhoods in the UK, united by a mission to ensure that no one is left out and that every person can belong, contribute and thrive.

Through our integrated 'Community Hub' model, we seek to create a new sense of neighbourhood in communities, previously forgotten by society, so that everyone, regardless of their background or starting point, can join together to overcome life's hurdles and reach their God-given potential.

Oasis Community Learning (OCL) is part of this global family and our mission is to deliver exceptional Education, delivered by remarkable people that strengthen our communities. Our five ethos values permeate everything we do and are obvious wherever and whenever anyone encounters OCL:

- A passion to include everyone
- A desire to treat everyone equally, respecting differences
- A commitment to healthy and open relationships
- A deep sense of hope that things can change and be transformed
- A sense of perseverance to keep going for the long haul

STOP THE TRAFFIK (STT) is also part of the Oasis global family and is a frontrunner in human trafficking prevention. STT works to create a world where people are not bought and sold; harnessing the power of data, technology, and the collective strength of networks to disrupt the criminal business of human trafficking, making it unprofitable, preventing exploitation, and protecting the safety and choice of those most at risk.

We, at Oasis, believe human trafficking and modern slavery are truly global issues. Our goal is to build resilient communities, by turning them into places where it is harder for traffickers to hide their activities and their victims.

As a major education provider, OCL takes seriously its responsibility to adopt a robust, proactive and ethical approach to preventing modern slavery and human trafficking. We are committed to ensuring that our academies and supply chains are safe, dignified and free from exploitation. We are actively working with STT to ensure that our work is free of human trafficking.

This statement sets out the activities and actions taken by OCL during the financial year 1 September 2024 – 31 August 2025 to understand and mitigate risks of modern slavery and human trafficking within our operations and supply chains.



Organisational Structure and Supply Chains

OCL was established in 2004 and has since grown into a family of 56 academies, educating more than 33,000 young people, 54% of whom are from disadvantaged backgrounds and 37% of whom speak English as an additional language. Our academies operate across five regions, providing primary, secondary and all-through education.

We employ over 5,000 staff, and all of our operations are based in the UK. Further information about our organisational structure is available at: www.oasiscommunitylearning.org/about-us

We are determined to raise the educational bar for all our students and to close the educational gap that exists between disadvantaged students and their more privileged counterparts. Our Oasis ethos is integral to our educational provision – it is an expression of our character, a statement of who we are and therefore the lens through which we assess all that we do.

OCL's supply chains cover a wide range of goods and services, including:

- Educational equipment, textbooks and resources suppliers
- Staff and student uniform suppliers
- Estates management, maintenance and services
- ICT equipment and services
- Catering services and supplies
- Cleaning services and supplies
- Peripatetic music services
- Supply / agency staffing

Our policies to resist modern slavery and human trafficking

Rooted in the Oasis ethos, our policies provide clear guidance on our ethical and legal responsibilities. We are confident that our policies promote good behaviour among our colleagues at work and within OCL. These are kept under review to reflect the changing needs of OCL and of the staff, students/pupils, and the communities we serve.

Among the policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act in OCL are:

- Code of Conduct & Confidentiality
- Equality & Diversity Policy
- Fraud Policy
- Gifts, Hospitality & Related Party Policy
- Recruitment and Selection Policy
- Whistleblowing Policy
- New Supplier Policy
- Purchasing & Tender Policy, including our Supplier Code of Conduct
- Safeguarding and Child Protection Policy



Role of Inclusion and Staff Forums

OCL has strengthened its approach to equality, dignity and ethical practice through a foundational inclusion infrastructure designed to surface risk early, listen systematically, and support consistent action across the organisation.

Central to this is the Oasis Inclusion Table, a cross-organisational forum bringing together insight from staff networks, leaders and colleagues with lived and professional experience to inform decision-making, policy development and assurance. The Inclusion Table helps identify patterns, risks and blind spots that may otherwise remain unseen, including those relating to exploitation, power imbalance and vulnerability within our workforce and supply chains.

This approach goes beyond a narrow focus on statutory protected characteristics, recognising that risk and marginalisation can arise for any individual depending on context or circumstance. Supported by the Inclusion Line, which provides clear and safe routes for concerns to be raised and escalated, these arrangements reinforce a culture in which speaking up is expected and supported, strengthening our ability to act ethically, uphold integrity, and prevent modern slavery and human trafficking across OCL.

Due Diligence Processes

OCL applies a range of due diligence measures across procurement, recruitment and supplier management to ensure ethical practice.

Safeguarding

Oasis Community Learning's Safeguarding & Child Protection Policy ensures all pupils are safe and are well supported. Grounded in the Oasis ethos and 9 Habits, the policy sets clear expectations for identifying and responding to harm, including modern slavery and trafficking.

Principals and Designated Safeguarding Leads ensure all staff receive regular training, updates and guidance in line with Keeping Children Safe in Education. Pupils are encouraged to speak up, concerns are promptly investigated, and persistent or unexplained absence is treated as a safeguarding risk. Oversight is provided by the OCL National Safeguarding Team, who audit practice and support academies to maintain high and consistent safeguarding standards.

Procurement and Supply Chains

We have a dedicated Procurement Manager to provide guidance and support across the organisation on all procurement matters.

A considerable proportion of procurement is undertaken through suppliers that are approved DfE framework providers and are pre-approved by either a purchasing consortium, such as Crown Commercial Services and Crescent Purchasing Consortium, or via formal tender processes to ensure robust supplier standards and reduced risk.

All tenders require suppliers to demonstrate ethical trading and compliance with the Modern Slavery Act 2015. We reserve the right to exclude any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

Suppliers to OCL are required to fully comply with the Modern Slavery Act 2015 and confirm adherence by accepting the OCL Terms and Conditions.



OCL strengthens the prevention of modern slavery through robust financial controls embedded in our New Supplier Policy. All suppliers must formally confirm compliance with the Modern Slavery Act 2015, and no supplier can be added to our system without passing a rigorous multi-stage vetting process that includes checks on company legitimacy, tax status, related-party risk, GDPR compliance, and independent bank-detail verification to prevent fraudulent or high-risk entities entering our supply chain. Our “No Purchase Order, No Pay” policy and restriction of supplier creation to authorised finance personnel ensure transparency and prevent informal or unverified labour arrangements, while Living Wage considerations and HMRC employment-status assessments further reduce the risk of exploitation within the supply chain.

Recruitment

OCL take the recruitment of permanent, fixed term and supply worker staff for our academies and national functions as a matter of paramount importance, underpinned by robust policies and procedures consistent with Keeping Children Safe in Education and in safer recruitment practice.

We operate a structured and comprehensive process that focuses on delivering appropriately vetted and qualified staff at the most advantageous cost to the Trust. Our strategies include the engagement of agencies via the preferred supplier list (when required). In addition, we ensure all new employees and third-party resource are subject to rigorous pre-employment checks including Right to Work in the UK, identity, qualification verification, references and checks with the Disclosure and Barring Service. In the case of supply workers our agency partners are responsible for conducting and confirming the satisfactory completion of these checks to us.

All interviews have at least one Safer Recruitment trained attendee from within the Trust and we ensure all necessary documentation regarding employee checks is saved for audit on our Single Central Record and/or available for review if saved elsewhere.

Fair Pay

Our Trust is committed to ensuring that all directly employed staff and contractors receive fair remuneration for the job or work that they perform. This is demonstrated through our commitment to pay our teaching and support staff, as a minimum, the real living wage as set by the Living Wage Foundation. Apprentices are paid as a minimum, the national minimum / national living wage applicable for their age, with OCL offering enhanced rates to apprentices in the first year of their apprenticeship.

Whistleblowing

In accordance with our ethos, OCL prides itself on having an open and honest culture and is committed to the highest possible standards of probity and accountability. We encourage employees with serious concerns about any aspects of the organisation’s work to voice those concerns under protected conditions whilst protecting anonymity if requested, this includes any circumstances that may give rise to increase risk of modern slavery or human trafficking.



Risk Assessment and Risk Management

Risk management is embedded throughout the Trusts operations, with any risk identified and mitigations shared with Trustees through the Audit and Risk Committee. Risk management strategies are implemented to ensure risk management is embedded in our day-to-day practises.

Our internal audits test internal procedures and controls including adherence to policies and procedures. Any non-compliances are included in internal audit reports, which are communicated to senior management and the Risk and Audit Committee.

Effective Remedy

Individually, employees are responsible for notifying their line manager should they become aware of any activities, either within the Trust or by any of its external suppliers or partners, that are not compliant with this statement.

Where allegations or suspicions of modern slavery or human trafficking arise within our operations or supply chain, we will initiate our critical incident process, which entails the following.

The OCL Board via delegation to committee will maintain oversight for the investigation process, senior leadership will be responsible for a coordinated investigation with support from national directorates as appropriate.

In line with our Oasis ethos, our response will be compassionate and place dignity at its heart. We will prioritise immediate safety and prevent further harm, working humbly and collaboratively with trusted partners, including Stop The Traffik and First Responder Organisations such as local authorities, Unseen UK and the Salvation Army, to support victims and ensure transparency. Where required by law, we will act responsibly to escalate concerns to the relevant statutory authorities.

We will engage with the supplier to work on a collaborative solution, securing a robust corrective action plan with clear timescales. Where issues cannot be remedied or a supplier fails to engage, we may terminate the relationship in line with legal and contractual obligations.

All actions, decisions, and lessons learned will be documented, and relevant policies updated to strengthen our ongoing approach to prevent modern slavery and human trafficking.

Training and Awareness

OCL recognises that building awareness across the organisation is essential to preventing modern slavery. To strengthen our collective understanding and vigilance, we have taken the following steps:

- We have discussed the Modern Slavery Act, its purpose, and OCL's responsibilities at a Board of Directors meeting, reinforcing our commitment at the highest level of governance.
- The Executive Leadership Team has been briefed on the Act and encouraged to continually assess where risks of modern slavery or human trafficking could arise within our organisation.



- We have provided targeted advice to our finance and procurement teams on avoiding modern slavery risks, including recognising potential indicators when sourcing goods and services. We will continue strengthening the assurances we require from suppliers regarding their own prevention measures.
- All staff are required to complete annual mandatory safeguarding training; this ensures that awareness is consistently embedded throughout OCL.
- Our Talent Acquisition Team supports hiring managers through standardised recruitment processes, offering guidance to ensure ethical and compliant hiring across the organisation.

Continuing vigilance

OCL reviews the effectiveness of its modern-slavery measures on an ongoing basis, using emerging insights to strengthen our processes and address areas where additional assurance may be needed. This reflective approach informs both the steps taken during 2024/25 and our priorities for the year ahead.

During 2024/25, we have taken the following actions to further strengthen our position:

- Created a preferred supplier list for supply staff following detailed due diligence, including mandatory checks on safeguarding standards, GDPR compliance, minimum essential insurance levels, mandatory industry accreditations, value-added services pricing and candidate ownership; ensuring only approved agencies are being used.
- Updated our Supplier Code of Conduct, clearly detailing our expectations of suppliers in the prevention of modern slavery. This has been circulated to existing suppliers and is mandatory for all new suppliers.
- Continued use of framework providers within the Trust due to enhanced supplier due diligence and risk mitigation.

For 2025/26 we will:

- Commission STT to conduct an inherent supply chain risk mapping and a gap analysis of existing due diligence processes, this will include the categorisation of suppliers to support the identification of risk against modern slavery and human trafficking.
- From this exercise we will implement recommendations to ensure continual improvement and development of our practise, and to inform updates to the New Supplier Policy and supplier forms.
- Continue to work closely with key partners to better understand how they are managing risks associated with modern slavery; to include integration of modern slavery within initiation meetings with all new suppliers and contracts to reinforce expectations.
- Track and monitor the number of critical incidents reported that are linked to concerns relating to modern slavery.



Declaration

This statement has been approved by Oasis Community Learning's Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Chair of Oasis Community Learning Board

Caroline Taylor

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Date: 12 03 26

CEO of Oasis Community Learning

John Barneby

A handwritten signature in blue ink, appearing to read "John Barneby", with a stylized flourish at the end.

Date: 12 03 26