MODERN SLAVERY STATEMENT
FINANCIAL YEAR ENDING 31 AUGUST 2022

THE TWO COUNTIES TRUST

Introduction

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

Because the Trust works primarily with UK-based suppliers and contractors, their employees are protected under UK employment law and working time directives. Whilst the Trust does not conduct business in countries where there is a documented problem with human trafficking or modern slavery, we remain acutely aware of the need to ensure that companies within our supply chain share our commitment to treating employees fairly and ethically.

Structure and supply chains

This statement covers the activities of The Two Counties Trust. As a Trust, our students are at the centre of our mission and we exist to provide our students with opportunities and experiences to enhance their life choices, making a positive contribution to the world we share. The Trust educates 11,000 students and employs over 1,500 staff. The Trust's supply chains are drawn mainly from the catering, contract cleaning and education supply market.

Policies

The policies we have in place, and this statement, reflects our commitment to paying people fairly and properly for their work; acting ethically and with integrity in all our business relationships; and deploying effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within the Trust or our supply chains.

All policies are reviewed on a rolling basis in response to longevity, statutory or regulatory change.

Risk Management

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 Trust's Risk and Audit Committee regularly. Risk management strategies have been implemented.

All academies within the Trust complete a risk register. Given the nature of our organisation a risk review of the protection of employees and students is included in our risk assessment 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.

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

We do not believe there are any high-risk operations within the Trust or with the supply chain with regards to modern slavery and human trafficking.

Low risk operations within the Trust or the supply chain with regards to modern slavery and human trafficking relate to the catering, cleaning and education supply chain as this involves the use of contractors, however as set out in this statement, these risks are low and have been mitigated as far as possible.

Child Protection and Safeguarding

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 academies, head office and in our subsidiary companies where staff and students can feel confident to raise any concerns that they may have about their own welfare or the wellbeing of others.

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

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

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

All academies 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.

If students are persistently absent from their academy, the reasons for this are investigated.

Each academy has a Designated Safeguarding Lead and a Deputy Designate Safeguarding Lead. Safeguarding procedures are overseen by a member of each Local Governing Body who acts as a Safeguarding Governor. The Trust has also established a network of Designated Safeguarding Leads from each academy who meet to review and continually develop safeguarding practices. The Trust has a designated Safeguarding Trustee and a Trust Lead for Safeguarding who is a member of the Executive Team.

Employment

The Trust expects all employees to portray the highest standards of personal and professional conduct and these expectations are contained within the Code of Conduct, which is provided to all employees on appointment and staff are reminded of the Code annually. The Code is updated annually.

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 academies. 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.

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.

The Trust has a range of employment policies in place including an Equality and Diversity policy, a Whistleblowing 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.

The Trust operates a comprehensive recruitment and selection process which is compliant with Keeping Children Safe in Education. The majority of staff are directly employed on a permanent or fixed term basis. The Trust employs people solely within England and has a statutory responsibility to undertake specified recruitment and vetting checks on individuals working within the organisation to maintain an up to date and accurate Single Central Record of these checks. The Two Counties Trust can demonstrate that rigorous vetting checks, including right to work in the UK, verification of identity, references, evidence of qualifications and criminal records disclosure have been carried out for all staff.

Whistleblowing policy

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.

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.

Procurement

The Trust is committed to ensuring that workers employed or engaged in its supply chains throughout the world are treated fairly, humanely and equitably and to this end we shall comply, and shall ensure that its Sub-contractors comply, in relation to all workers employed or engaged by it directly or indirectly in connection with the supply of goods and the performance of the Services, with the Modern Slavery Act 2015.

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 formal tender process.

All our 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 academies. It is the responsibility of the contractor to ensure that the same checks are carried out on any Sub-Contractors prior to inviting them to work within our academies.

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.

Any serious violation of the Trust's standards will lead to a review and possible termination of the business relationship.

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 2022.

Signed  **Date** 06 October 2022

Karen Potts
Chair of Trustees