

## Modern Slavery Act 2015

### Modern Slavery & Human Trafficking Statement

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. New London Educational Trust (NLET) is committed to improving our practices to combat slavery and human trafficking.

#### **Organisational Structure**

NLET is an education provider founded in 2012. It has a vision to create an environment where everyone has the opportunity to grow, achieve and improve their life chances through social and economic regeneration, education, training and community-based activities. Currently, these activities include Apprenticeships, Advanced Learner Loan funded courses, adult English and Mathematics courses, Employability Skills and an Examination Centre. We have a global annual turnover of circa £2.5 million.

#### **Our Supply Chains**

Our supply chains include:

- Administrative and office material supplies.
- Agencies offering education related services e.g. teacher recruitment, student recruitment, advertising and consultancy.

#### **Our Policies on Slavery & Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have put in place a designated modern slavery and human trafficking policy and we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our Modern Slavery and Human Trafficking Policy demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

#### **Due Diligence Processes for Slavery & Human Trafficking**

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

#### **Supplier Adherence to our Values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a supply chain compliance programme.

- We include clauses in supplier agreements requiring compliance with anti-slavery measures.
- We expect our suppliers to demonstrate compliance with anti-slavery measures by issue of antislavery statements on their websites, policies and/or procedures.

Compliance is monitored by a team led by the Student Services Manager, with representation from the Senior Management Team and Heads of Departments.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we shall offer training to our staff. All trustees and senior management have been briefed on the subject. We also expect our business partners to provide comparable training to their staff, suppliers and providers.

## **Our Effectiveness in Combating Slavery & Human Trafficking**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Annual review of all relevant organisational policies, ensuring compliance with the Act.
- Maintain robust immigration checks for all employees, learners and contractors.
- Annual review of salaries to ensure minimum wage is adopted.
- Assess new suppliers to identify risk areas and identify whether additional due diligence is required.
- Seek assurance from new suppliers that they comply with the Act, seeking annually thereafter.
- Review contracts and consider inclusion of obligations to comply with the Act.

## **Further Steps**

Following a review of the effectiveness of the steps we have taken in January 2021 to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- Keep abreast of any updated information and case law connected with the Act and further review policies and processes in order to remain compliant.
- Implement regular training for staff to ensure awareness of modern slavery is kept current.
- Review, update and publish this statement annually.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes New London Educational Trust's (NLET's) slavery and human trafficking statement for the financial year ending December 2021.**



Ian Whitehead, Director of Operations  
New London Educational Trust  
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