

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (“the Act”). It constitutes Ruskin Mill Trust’s anti-slavery and human trafficking statement for the financial year 1 September 2021 – 31 August 2022 and is the first statement issued in accordance with the Act.

The Trust opposes slavery and human trafficking in all its forms and makes this statement to set out the steps we have taken and intend to take with the aim of preventing slavery or human trafficking in our own operations and in our supply chains.

About us

Ruskin Mill Trust (“the Trust”) is an independent specialist educational provider offering a range of course subjects to learners with complex needs, providing both residential and day placements at a number of schools and colleges throughout the UK. The Trust is the head of a Group of subsidiary companies which operate the schools and together which meet the criteria for publication of an annual statement. This statement applies across the Group.

Risk assessment and procurement processes

The Trust is working towards the development of effective systems to help identify and monitor the risk of slavery and human trafficking and to encourage zero tolerance to it within our business and within our supply chain. While we consider that the risk in our supply chain is low, we recognise that no supply chain can be considered entirely risk free and we take seriously our responsibility to be alert to those risks. The Trust already aims to adhere to general ethical trading principles when undergoing procurement processes or contracting with third parties and it expects its partners and suppliers to share its commitment to acting with integrity. The Trust is pro-active in removing suppliers where there is a divergence in ethical values.

Our supply base

The Trust has a large supply chain with a variety of (and in some cases long standing) commercial relationships with contractors and suppliers, most of whom are UK based. The likely risk areas would be repair and maintenance contractors and building construction works.

In order to implement the changes required to enhance and build the Trust’s systems to better address the issues around modern slavery, we will begin with a review of current suppliers who supply directly to the Trust. We should be able to identify any gaps, make clear our expectations and aim to encourage a strengthened and aligned commitment to the Trust’s values in this area. Where possible, we will look to update the contractual arrangements with up-to-date references and assurances regarding modern slavery. In addition, we will look to update our programme of due diligence for future procurement, including a process of mapping the areas at higher risk.

In our own business

We believe there is a low risk of slavery and human trafficking within our operations. The Trust is an equal opportunities employer, committed to creating and ensuring a non-discriminatory, inclusive and respectful working environment for all its staff. It is hoped that staff feel confident to expose wrongdoing without any risk to themselves.

Our risk area is agency managed staff.

Potential risks are mitigated by our policies and procedures, controls built into our business operations and the knowledge, skills and behaviours of our staff. The recruitment processes and the controls in place for pre-employment screening help minimise the risk. The controls include checks on individuals right to work in the UK, in depth prior employment checks and ensuring that we only employ agency workers through reputable employment agencies which address modern slavery commitments to the same or higher degree.

Training and awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, the senior management team (“Executive Team”) have been updated in relation to the Trust’s ongoing obligations and they will oversee the continued implementation of Trust-wide measures including the delivery of contract management training to the relevant staff. In addition, we are working towards the delivery of an awareness training to all staff through targeted communications and within other training areas such as safeguarding or health & safety.

We continue to develop our policies and procedures and have updated those which are relevant to modern slavery to assist with further awareness within the staff cohort. These are as follows:

Safer Recruitment policy

Safeguarding

Staff code of conduct

Whistleblowing

Our policies are reviewed at least every three years

This modern slavery statement will be regularly reviewed and updated as necessary. The Trust’s Board of Trustees endorses this statement and is fully committed to its implementation.

Approved by the Board on 9 November 2021