

LEAD Education Modern Slavery Statement

PART A: Introduction

1. LEAD Education is committed to understanding and mitigating the risks of slavery and human trafficking in our corporate activities.

2. By publishing an annual transparency statement, detailing activities undertaken over the latest financial year relating to Modern Slavery mitigation, the LEAD can keep stakeholders up to date and ensure continued compliance with the obligations arising from section 54 of the Modern Slavery Act 2015.

Organisational Structure

3. This statement covers the activities of LEAD, including direct employees of LEAD and services delivered on behalf of LEAD by third party organisations.

Areas of operation and supply and high-risk activities:

4. LEAD operates within the United Kingdom, which is considered at low risk of slavery and human trafficking, relative to other parts of the world.

5. Intelligence indicates that several slavery and trafficking incidents have been identified across the United Kingdom, including in parts of the North East of England. LEAD remains vigilant to the ongoing threat of Modern Slavery and to the potential that Modern Slavery could be taking place undetected in LEAD operating areas.

6. LEAD engages in a wide range of business activities, from education support in Kindergartens to 19-24 and adult education. None of these sectors are classified as high risk for labour exploitation. However, certain frontline workers may be more likely to encounter victims or perpetrators. The LEAD Education Modern Slavery Strategy sets out ways to raise awareness amongst these service areas and engage staff to help us tackle modern slavery.

Responsibility:

7. Each Head of Service is responsible for ensuring risks of Modern Slavery are understood and mitigated against in their service area, and for using appropriate resources to prevent and disrupt slavery and to support and protect victims.

8. Any concerns regarding modern slavery or human trafficking in the organisation should be raised with the Corporate Director of Business and Resources.

PART B: Modern slavery policies and initiatives implemented to date

9. LEAD has a number of policies in place which protect employees against the risk of modern slavery within the organisation. These include:

- Employee Code of Conduct - this code sets out actions and behaviours expected of employees when representing the organisation.
- 'Speak Out' Whistleblowing Policy - This policy supports employees, contractors and partners with concerns about any aspect of LEADS work to come forward and voice these concerns.
- Equality and Diversity Policies - LEAD has two Equality and Diversity Policies, one for employees and one for residents, which outline a commitment to achieving equality of opportunity and a respect for diversity in all areas of the business, aiming to: eliminate unlawful discrimination; promote equality of opportunity; promote equality of access; and promote good relations between diverse communities.
- Recruitment Policies - LEAD has a range of robust, transparent and regularly-reviewed procedures in place for the recruitment and vetting of new employees, ensuring they are able to confirm their identities and qualifications, and that they are paid directly into an appropriate, personal bank account.
- Responsible Procurement - responsible procurement, as set out in LEADS Procurement Strategy 2016-2020, is an integral duty in LEADS procurement process, ensuring ethical, honest and fair procurement.

10. This transparency statement provides an annual opportunity to set out progress made against the ambitions presented in the LEAD Education Slavery Strategy:

Modern Slavery strategy action areas - Identify

What we said we would do:

Raise awareness of indicators of slavery with all staff, including training for teachers and other key staff more likely to encounter victims of modern slavery, to ensure staff are able to help identify and report concerns.

What we have achieved:

- Shared guidance on how to recognise signs of slavery and trafficking to all staff, via Staff News
- Developed and issued a Modern Slavery and Trafficking e-learning module to all staff
- Offered safeguarding awareness training to help relevant staff identify and report incidences or indicators of abuse and neglect, including modern slavery or trafficking

Areas for future action:

- Deliver Modern Slavery training to more employees
- Explore ways to develop a system for capturing, analysing, sharing and responding to soft intelligence

Modern Slavery strategy action areas - Respond

What we said we would do:

- Develop and embed a Modern Slavery, Trafficking and Exploitation Response Plan to ensure ability to respond quickly and appropriately to the identification of incidences or concerns of modern slavery in the area
- Deliver training on National Referral Mechanism for all staff who may encounter potential victims

What we have achieved:

- Tested Response Plan pathways (June 2019), through a Modern Slavery resilience simulation exercise, involving LEAD and multi-agency partners
- Used simulation to inform final Modern Slavery, Trafficking and Exploitation and Response Plan (August 2019)

Areas for future action:

- Ensure ongoing training is delivered to contact centre officers

Modern Slavery strategy action areas - Support

What we said we would do:

Deliver appropriate training to relevant staff on how to work with, and the rights of, potential victims.

What we have achieved:

Circulated function-specific Modern Slavery mitigation resources and advice (including National Referral Mechanism guidance and detailed information on Trafficking survivor Care Standards) to senior managers (April 2019), to prompt cascade of information / advice.

Areas for future action:

Further embed guidance on victim support, including with housing and other non-social care employees.

Modern Slavery strategy action areas - Disrupt

What we said we would do:

Deliver training to relevant teams to ensure staff understand their role to support police disruption operations and how they can maximise evidence preservation and increase chances of prosecution.

Areas for future action:

Further embed disruption/powers of entry guidance and training.

Modern Slavery strategy action areas - Prevent

What we said we would do:

Engage Procurement, HR and Commissioning to commit to ongoing and proactive efforts to mitigate risks of slavery in the supply chain, including by communicating clear expectations for suppliers and providers.

What we have achieved:

- Ensured Modern Slavery Act 2015 compliance is a part of all procurement due diligence, through requiring suppliers to confirm annual modern slavery reporting requirements and declare any trafficking offences as part of the Supplier Selection Questionnaire
- Strengthened internal HR policies to better protect employees and identify risks, including development of an online recruitment and DBS portal

- Circulated function-specific Modern Slavery mitigation resources and advice (including guidance relating to recruitment and supply chain risk assessments) to all senior managers (April 2019)
- Shared information and resources for all staff, including commissioning and procurement-specific resources

Areas for future action:

Form a Modern Slavery Prevention working group, with representatives from HR, Procurement and Commissioning to keep up with best practice and improve risk assessments, monitoring of contracts, and communication with suppliers.

Modern Slavery strategy action areas - Engage

What we said we would do:

Complement national modern slavery awareness campaigns with local approach, leveraging communications capacity and partnerships.

What we have achieved:

- Shared information on modern slavery indicators and advice on how to report concerns with residents including via LEAD social media and website
- Issued press releases to share information about modern slavery, including to align with 'World Day Against Trafficking in Persons' (August 2019)
- Cascaded modern slavery advice locally in response to national campaigns (e.g. sharing information during Coronavirus outbreak)

Areas for future action:

Work with local partners (businesses, public sector partners, third sector, community groups and networks) to improve, coordinate and target communications.

PART C: Practical Guidance on Slavery and Trafficking

Recognising modern day slavery and trafficking:

The true extent of modern slavery is unknown, but there are estimated to be between 10-13,000 victims of slavery and trafficking currently in the UK and millions worldwide.

Victims are forced against their will to work for little or no pay for the benefit of others. They are often abused or threatened and stripped of their rights.

There is no typical victim of slavery. Victims can be men, women or children of all ages and nationalities. Many victims are foreign nationals who are brought into the UK specifically so that they can be exploited for the benefit of others, however, a high number of victims are UK nationals, including children.

Modern slavery crimes take place in many different sectors and workplaces, including factories, fields, retail or service units, and within private homes.

Crimes of modern slavery have taken place all over the country. Intelligence suggests that includes within LEAD operating areas.

Key indicators of potential trafficking include:

- Is the person in possession of their own passport, identification or travel documents or are these documents in possession of someone else?
- Does the person act if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?
- Was the person recruited for one purpose and forced to engage in some other job? Have transport costs been paid for by facilitators, whom they must pay back through working or providing services?
- Does the person receive little or no payment for their work? Is someone else in control of their earnings?
- Does the victim have freedom of movement? Are they dropped off and collected from work?
- Is the person withdrawn or do they appear frightened?
- Has the person or their family been threatened with harm if they attempt to escape?
- Is the person under the impression they are bonded by debt, or in a situation of dependence?
- Has the person been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities?

- Can the person freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?

What to do if you encounter or suspect modern day slavery or trafficking?

In the first instance the point of contact for all modern slavery crimes should be the local police force. If you have information about a potential modern slavery crime that requires an immediate response (such as where victims are at risk) dial 999.

If you hold information that could lead to the identification, discovery and recovery of victims in the UK, you can contact the Modern Slavery Helpline on 0800 0121 700. Alternatively, you can make calls anonymously to Crimestoppers on 0800 555 111.

If you have concerns or suspect that an adult is at risk of harm or abuse, you can call LEAD Education main point of contact for Safeguarding:

- 07944102606 (Monday to Friday, 8.30am until 5pm)
- Or email steve@leadeducation.co.uk