

## **Anti-slavery and Human Trafficking Statement**

ELT/SLT responsibility:	Executive Director of Human Resources, Organisation Development & Marketing		
Applies to:	<ul style="list-style-type: none"><li>• All RNN Group Employees</li><li>• All RES Employees and Workers</li><li>• National Fluid Power Centre Employees</li><li>• All Sub-Contractors</li><li>• Volunteers</li><li>• Student Teachers</li><li>• Contractors</li><li>• Work Experience</li></ul>		
Implementation date:	1 April 2023	Review date:	31 March 2024
Approved by:	<ul style="list-style-type: none"><li>• Senior Leadership Team</li><li>• Trade Unions</li></ul>	Approval date:	
Related documents:	<ul style="list-style-type: none"><li>• Recruitment and Selection Policy</li><li>• Safeguarding Checks Policy</li><li>• Safeguarding for All Policy</li><li>• Grievance Procedure</li><li>• Code of Conduct</li><li>• Supply Chain Management Procedure</li><li>• Financial Regulations Policy</li></ul>		
EQUALITY IMPACT ASSESSMENT			
Approved by:	N/A	Approval date:	N/A
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## **1. Introduction**

- 1.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the RNN Group's slavery and human trafficking statement for the financial year ending 2022/23.
- 1.2 RNN Group is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its services including the engagement of sub-contractors. This statement sets out the preventative steps that the Group is taking (and intends to take) to avoid the risk of modern slavery occurring within our services.

## **2. Organisational structure**

- 2.1 RNN Group is a Further and Higher Education and Training provider that employs approximately 1,000 staff, operating in the United Kingdom (South Yorkshire and North Nottinghamshire). Its core business is teaching a learner population of approximately 11,000 for 16-18yr olds, apprentices and adults.
- 2.2 There are two subsidiary organisations, Rotherham Education Services and National Fluid Power Centre comprising of workers and employees.
- 2.2 RNN Group has an annual turnover of £36m, a significant proportion of which is spent on goods and services to support the running of the organisation.

## **3. Due diligence processes**

- 3.1 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our services, the RNN Group will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.
- 3.2 RNN Group has in place systems to:
- Identify and assess the 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'.
  - Protect identified victims of modern slavery or human trafficking until such time as appropriate support can be given by the relevant authorities.
- 3.3 RNN Group identifies the following as the principle areas of potential risk:
- Supply chains, outsourced functions, recruitment practices, recruitment agencies and subsidiaries (where applicable).

## **4. Supply chains**

- 4.1 In its supply chains, the RNN Group has identified the following business areas as carrying material risks of modern slavery occurring:
- Sub-Contracting or use of recruitment agencies
  - Estates/procurement
  - Catering services
  - I.T., office equipment
  - Online Services

- 4.2 When procuring any types of goods or services, the RNN Group requires any potential third-party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.
- 4.3 Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or the RNN Group's own policies and procedures, will be removed from the list of suppliers and will not be considered for future supply to the RNN Group unless they can demonstrate that these compliance requirements are met.
- 4.4 In terms of future steps, the RNN Group will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products although most of our suppliers are from within the UK.

## **5. Training**

- 5.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers where appropriate. As of April 2023, 44.6% of our workers have undertaken some form of Modern Slavery training and this continues to increase as all employees and workers have access to free training at any time.
- 5.2 Modern Slavery is covered in our in-house delivered Equality, Diversity & Inclusion training which is delivered to all staff across the organisation as part of a rolling programme throughout the year. Furthermore, in-depth, in-house Modern Slavery training can be made available at the request of managers, if required.

## **6. Recruitment practises**

- 6.1 Temporary staff and staff recruited indirectly by the RNN Group are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, the RNN Group conducts checks on such agencies before they are approved and uses only a small number of preferred agency suppliers.
- 6.2 Through its recruitment processes, the RNN Group ensures that all approved recruitment agencies conduct relevant pre-recruitment checks and provide evidence that such checks have been conducted and these are regularly reviewed and amended as appropriate. Any agencies who do not comply with FE Safer Recruitment guidelines are removed from future engagement.
- 6.3 All recruitment and selection processes are conducted by managers/staff who are appropriately trained in Safer Recruitment & Safeguarding practices and this is renewed at least every 3 years. Final checks before any formal offers are made are conducted by HR.
- 6.4 All workers are asked to present a form of photographic evidence, and/or right to work in the UK, prior to or on their first day which is verified by an appointed person, usually a manager or a member of HR.
- 6.5 All employees confirm, prior to commencement of work, that they have accepted the offer of employment of their own freewill and have not been coerced, or forced and/or that they do not owe anyone any monies for securing the work for them.

## **7. Policies**

- 7.1 The RNN Group already implements the following policies, which embed good practice and provides remedies for individuals concerned about any potential instances of modern slavery in any part of the college business. The RNN Group operates the following policies:

Grievance and Complaints policies – these policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

Employee Code of Conduct – this code sets out the actions and behaviour expected of them whilst employed by the RNN Group. The RNN Group strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.

Whistle Blowing Policy (incorporating Anti-bribery and corruption) – the RNN Group is committed to the highest standards of ethical conduct and integrity in its business activities. The RNN Group will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf.

Procurement Policy – this policy reflects the RNN Group's commitment to acting ethically and with integrity in its business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls.

Recruitment & Selection Policy – this policy ensures that the RNN Group follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

## **8. Performance indicators**

- 8.1 Where the RNN Group has identified risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPIs) to measure progress against reducing such risks. The RNN Group will consider setting and reviewing KPIs in the following contexts:

- use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery
- Referrals made to HR or safeguarding officers are dealt with timely and ensuring any potential victims are supported and not at risk of further harm
- training and awareness-raising amongst staff including risk management; appropriate decision-making and timely remedial action
- oversight of third-party suppliers of relevant goods and services supply chains

- 8.2 This statement will be made available to all staff members, stakeholders and the general public by publication on our website. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including circulation of the policy during the induction process for new employees including access to online training.

- 8.3 Having assessed the training needs for staff operating in different parts of the RNN Group, they will look at devising and implementing training and awareness-raising methods attuned to relevant staffing groups. Training courses may be devised in cooperation with external, specialist training providers.

This statement has been approved by the RNN Group's Executive Leadership Team and will be reviewed at least once annually.

Signed by Chief Executive

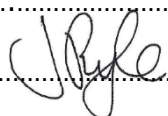
Name.....Jason Austin .....

Signature.....  .....

Date.....21/06/23.....

Signed by Chair of the Board of Governors

Name.....Janet Pryke.....

Signature.....  .....

Date.....21/06/2023.....