

# Modern Slavery Act Statement

## Overley Hall Ltd



Overley Hall  
School

Approved by: Support & Scrutiny Board

Date: 11<sup>th</sup> April 2024

Next review due 10<sup>th</sup> April 2025

by:

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## Introduction

Overley Hall Ltd (Overley Hall) is fully committed to safeguarding and promoting the welfare of all its pupils, residents, staff and suppliers. Section 54 of the Modern Slavery Act 2015 requires some organisations to publish an annual statement setting out the steps that they've taken to ensure modern slavery is not taking place in their business or supply chains.

Overley Hall as an organisation does not reach the turnover threshold that requires them to assess and publish a Modern Slavery Act Statement but acknowledges that it is best practice to do so.

## Human Trafficking and Modern Slavery Statement 2023 - 2024

This statement is made on behalf of Overley Hall Ltd and pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. This statement relates to actions and activities during the period April 2023 to March 2024 and is made in conjunction with Overley Hall policy in relation to Modern Slavery with the aim of preventing opportunities for modern slavery to occur within its business or supply chain and safeguarding any customers who may be at risk.

This statement and policy applies to all individuals working for or with Overley Hall in any form, including our supply chain, contractors, employees and all other business partners.

Overley Hall recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is committed to preventing slavery and human trafficking within its activities and to ensuring that its supply chains are free from slavery and human trafficking.

This statement sets out Overley Hall’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its business and supply chains.

## Structure

Overley Hall’s principle activities are the provision of education (at Overley Hall School) and accommodation (at Wellingtonia) for up to 24 young people between the ages of 8 and 19 years of age with significant learning disabilities and co-existing needs. Some of our learners are Day students only. Overley Hall also provides accommodation for four adults who live on the Overley Hall site within separate accommodation (The Woodlands).

## Our approach

Overley Hall has a zero-tolerance approach to any form of modern slavery and trafficking. We are committed to acting ethically, with integrity and transparency in all business dealings and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and deter modern slavery.

## Our policies, documentation, and key relationships

The following key policies and documentation detail our approach to protecting our learners, residents and staff from modern slavery and ensuring our supply chains are free from modern slavery.

These include:

- ♣ Employee Handbook;
- ♣ Equality & Diversity Policy;
- ♣ Safeguarding Children in Education Policy;
- ♣ Safer Recruitment Policy;
- ♣ Whistleblowing Policy;
- ♣ Procurement and Contracts; and

## ♣ Supplier Terms and Conditions.

In addition, we work closely with the National Joint Council (NJC) to help reduce risk by improving employee working and pay practices. Our Remuneration Committee (REMCO) has oversight of the process and practices embedded within Overley Hall to reduce Modern Slavery and in ensuring our supply chains which rely on people can demonstrate adherence with local and national laws and regulations, including paying the minimum wage.

## Identifying and addressing risks

We recognise as a Company that there are two main avenues of risk through which modern slavery could impact the organisation. The first is through matters of a safeguarding nature which covers child sexual exploitation or human trafficking which can directly impact our pupils. This also potentially affects the staff of our contractors. The second is our supply chain and the vendors we contract.

## Procurement and supply chain

We are committed to ensuring that there is transparency in our business and our approach to tackling modern slavery is consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, against the use of forced, compulsory and trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

The biggest risk to our organisation of falling foul of the Modern Slavery Act is through our procurement of goods and services. Whilst we cannot 100% guarantee supplier adherence with the requirements of the Modern Slavery Act we will endeavour to eliminate the risks as much as possible. We will do this by ensuring that our procurement processes, supplier code of conduct and contractual terms include specific provision relating to the Modern Slavery Act.

## Safeguarding

Modern Slavery and trafficking are both forms of abuse and therefore our safeguarding policies and procedures should be followed. All frontline employees receive Safeguarding Children training which incorporates modern slavery. These employees have an individual responsibility for ensuring that they are familiar with the signs and indicators and that they are aware of our Safeguarding policies and procedures so that they are able to respond appropriately. Line managers must ensure that safeguarding training is kept up to date.

## Training for staff

Every member of staff, whether they are based in the school or not, are trained on the policy. In addition, Overley Hall School, Wellingtonia and The Woodlands all have a Whistleblowing Policy which enables those with concerns about any wrongdoing or breaches of law are able to raise these concerns in confidence without fear of disciplinary action.

We evaluate our processes for raising concerns to ensure that there are clearly identified ways to report concerns of whistleblowing or modern slavery which are available to all users of our premises.