



Ethical Sourcing and Modern Slavery Policy

Document control table

Document title:	Ethical Sourcing and Modern Slavery Policy		
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Version number:	V3		
Date approved:	4 December 2025		
Approved by:	Audit & Risk Committee of the OGAT Board		
Date of next review:	November 2026		
Document History			
Version	Date	Reviewer	Note of revisions
2	Nov 24	S Richards	Updated for PCR legislation changes
3	Nov 25	S Richards	Updated full document to read as a more concise and interpretable policy.

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1. Purpose

This policy sets out Outwood Grange Academies Trust's (the Trust) commitment to high ethical standards in all operational and procurement activities.

The Trust is committed to ethical sourcing, ensuring all procured goods, works, and services meet these standards. We expect staff, suppliers, service providers, and contractors to comply with this policy and demonstrate a commitment to continuous ethical improvement.

Our procurement process aligns with the Ethical Trading Initiative (ETI) Base Code, based on International Labour Organisation (ILO) conventions, and complies with all relevant UK legislation.

2. Scope

This policy ensures the Trust considers the wider impact of its operations and procurement activities, allowing selection of the Most Advantageous Tender (MAT) that delivers broader economic, social, and environmental benefits (e.g., to students and communities).

It applies to all areas of the Trust and its direct suppliers and contractors. Direct parties must comply and ensure similar compliance throughout their supply chains. All parties must adhere to applicable national and international laws.

Core Aims:

- Define ethical practice for the Trust.
- State the clear policy objectives.
- Promote the adoption and improvement of ethical practices globally.

3. Defining Ethical Practices

Ethical procurement respects fundamental standards regarding criminal/non-criminal conduct, human rights, and environmental abuse, aiming for continuous improvement influenced by supply chain decisions.

Category	Examples (Non-exhaustive)
Criminal/Non-Criminal Conduct	Transparency, Bribery, Fraud, Corruption, Tax Abuse, Conflict of Interest, Fairness.
Human Rights/Labour	Fair Employment, Improved Working Conditions, Living Wage, Health & Safety, Right to Unionise, Child Employment, Working Hours, Training, Equality (Race, Gender, Age, Disability, etc.), No Slavery, Physical/Verbal/Sexual Abuse.
Environment	Sustainability, Global Warming/Climate Change, Deforestation, Pollution, Threat of Extinction.

4. Working with The Trust

All employees, suppliers, service providers, and contractors must apply the highest ethical standards in their operations and supply chains, including adherence to the Trust's social value priorities for economic, social, and environmental well-being.

- **Recruitment:** The Trust uses robust, transparent recruitment processes, ensuring all employees (full/part-time) have:
 - Signed contract terms.
 - Satisfactory references, including addressing employment gaps.
 - Required professional qualifications.
 - Enhanced Disclosure and Barring Service (DBS) checks.
 - Eligibility to work in the UK ID check.
- **Agency Staff:** All agencies must adhere to the same rigorous checks and contractual prerequisites for staff supplied. Failure to comply will result in suspension or termination from the supply chain.

The Trust, as part of its procurement process, works closely with supply agencies, other suppliers and service providers to ensure that they also carry out the requisite checks.

5. Improving Labour Conditions - Ethical Trading Initiative (ETI) Base Code Principles

- **Freedom of Association & Collective Bargaining:** Respected. Workers have the right to join/form trade unions and bargain collectively.
- **Discrimination:** Prohibited in hiring, compensation, training, promotion, termination, or retirement (including unlawful discrimination under the Equality Act 2010).
- **Blacklists:** Prohibited, specifically the unlawful compilation, use, sale, or supply of lists detailing:
 - Trade union members/participants.
 - Individuals involved in whistleblowing about malpractice, fraud, or deficiencies.
- **Freely Chosen Employment:** No forced, bonded, or involuntary prison labour. Workers are free to leave after reasonable notice; no requirement to lodge deposits or identity papers.
- **Safe Working Conditions:** Appropriate health and safety policies, procedures, and training are mandatory, overseen by a senior manager. Conditions must be comfortable and hygienic.
- **Good Health Promotion:** Investment in measures to tackle ill health; employees have access to a confidential Employee Assistance Programme (EAP) via Health Assured.
- **Working Hours:** Must comply with national laws or industry standards, whichever offers greater protection.

- **Minimum Wages:** Wages and benefits must meet at least national legal standards. Deductions are only permitted as per national law or agreed without duress.
- **Regular Employment:** Work should be based on recognised employment relationships. Avoiding labour/social security obligations through misuse of sub-contracting or excessive fixed-term contracts is prohibited. Excessive use of zero-hour contracts should be avoided or offer greater protection (e.g., guaranteed hours, holiday/sick pay entitlements).
- **Training:** Employees' skills should be raised through professional development and training.
- **Disputes Procedure:** Clear, accessible processes for resolving employee disputes must be provided.
- **Child Labour:** Eliminated, consistent with ILO Convention 138. Children found in labour must be provided with quality education. Young persons (under 18) must not be employed at night or in hazardous conditions.
- **Inhumane Treatment:** Prohibited (including physical abuse, sexual/other harassment, verbal abuse, or intimidation).
- **Integrity and Transparency:** Procurement must be fair, open, and transparent. Suppliers must ensure public money is used appropriately.
- **Whistleblowing:** Suppliers must have a similar policy to the Trust's Whistleblowing Policy, which encourages raising disclosures and serious allegations of wrongdoing.
- **Modern Slavery Act 2015:** The Trust is committed to preventing slavery and human trafficking in its operations and supply chains. Direct suppliers must demonstrate the same commitment throughout their own supply chain. The Trust has a duty to notify the Secretary of State of suspected victims.

6. Responsible supply chain

Suppliers must commit to continuous improvement of the ethical performance of their supply chain. This commitment covers areas such as:

Small to Medium Enterprises (SMEs)

The Trust is committed to engaging with Small to medium Enterprises (SMEs) and Voluntary, Community and Social Enterprises (VCSEs), as well as other charitable organisations. Contracts may be divided into lots in accordance with The Procurement Act 2023, also pre-tender engagement is designed to encourage suppliers within these areas to take part and understand the process and the requirements.

The definition of an SME is that it must meet two of the following criteria:

- It has a turnover of less than £36M
- It has gross assets of less than £18M
- It has less than 250 employees

Environment

The supplier, service provider and contractor endeavour to purchase through suppliers and contractors who are continuously working at improving labour and environmental standards in the supply chain. Organisations such as but not limited to Environment standards (ISO14001 and EMAS management systems), Consumer facing standards (Fairtrade, Rainforest Alliance, Tea Sourcing Partnership (TSP)), Organic (Soil Association), Management of world forests (FSC and PEFC) and Commitment to continuous improvement of the ethical performance of supply chain (SEDEX).

The Trust has developed a sustainability action plan to address both sustainability and climate change 2022-27. This is part of the wider government's sustainability targets and commits the Trust to;

- reduce waste
- use recycled materials where possible
- reduce water usage
- Reduce carbon footprint
- Protect natural habitats and encourage local wildlife

Fair Payments throughout the Supply Chain

The Trust has committed to fair payment for goods, works and services ensuring all suppliers, service providers and contractors are paid promptly through the supply chain. In return, all direct suppliers are required to demonstrate a similar commitment throughout their own supply chain.

7. The legal context for Ethical Procurement

The Trust operates within the legal framework governing public procurement, including the EU Treaty principles (non-discrimination, equal treatment and transparency) and The Procurement Act 2023. This is captured in the supplier questionnaire which forms part of the over threshold tenders.

Mandatory exclusion: Applies to suppliers involved in criminal organisations, corruption, bribery, fraud, money laundering, child/ drug trafficking, terrorism offences or un-rectified breaches of tax/ social security obligations within a period of five years.

Discretionary grounds for exclusion: More widely defined, including professional or commercial misfeasance and 'Grave Professional Misconduct' (e.g. violation of applicable laws or ethical standards denoting wrongful intent or gross negligence).

Tax Compliance: Suppliers must notify the Trust of any "occasion of tax non-compliance (OONC)" during contract terms.

IR35 (Off-Payroll Working Rules): The Trust takes responsibility for ensuring its workers (including off-payroll) pay the correct amount of tax and requires direct suppliers to do the same.

Procurement Law: The Trust acts fairly and in accordance with the rules of Natural Justice. Ethical issues must be relevant to the contract's subject matter and consistent with achieving the Most Advantageous Tender (MAT), which is the optimum combination of whole-life costs and benefits.