This document is classified as Unclassified

Modern Slavery Statement

Shaw Trust

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by the Shaw Trust Group: Careers Development Group; Disabled Living Foundation; Forth Sector; Forth Sector Development Limited; Ixion Business Ltd; Optimus Education Ltd; Prospects Distribution Services Ltd; Prospects Group 2011 Ltd; Prospects Services Midco Ltd; Shaw Trust Enterprises Ltd; Shaw Trust International Partnerships Ltd; and Prospects Services for the period August 2023 – August 2024 to prevent Modern Slavery and Human Trafficking in its own business operations and within supply chains.

Introduction

Shaw Trust is fully committed to the Modern slavery Act 2015 and the duty it places on large organisations, including Shaw Trust, to disclose publicly the steps they are taking to prevent modern slavery organisationally and, in their supply chains

At Shaw Trust we take pride in our ‘charitable heart with a commercial brain’ approach to what we do. Our focus is to deliver quality services that also maximise social value and social investment to communities. This approach allows us to meet:

**Our Vision**

A future where good employment is accessible to all in society irrespective of life circumstances.

**Our Mission**

To co-create and deliver high quality employability programmes and complementary services for people with complex needs, challenging life circumstances or other barriers that impact on access to work.

Business and Operational Structure

Shaw Trust is the UK’s largest Not-for-Profit (NFP) social enterprise in the employment sector and one of the largest charities in the UK. The Shaw Trust Group employs over 2,900 staff.

Shaw Trust owns:

Ixion CG Ltd

Ixion Holdings (Contracts) Limited

Ixion Social Enterprise Limited

Optimus Education Ltd

Prospects Education Services Ltd

Prospects Group 2011 Ltd

Shaw Education Trust

Shaw Trust Enterprises Ltd

Shaw Trust International Partnerships Ltd

Shaw Trust Services Ltd

Careers Development Group

ST07033535

Disabled Living Foundation

Essex Business Support Ltd

Forth Sector

Forth Sector Development Limited

Homes 2 Inspire Ltd

Ixion Business Ltd

Prospects Services

Prospects Services Midco Ltd

Star Skills

The Shaw Education Trust

Shaw Trust uses several suppliers across all its functions, to enable it to carry out its charitable and business purposes.

Key Focus Areas

In 2023/2024 we will focus on:

**1. Procurement -** Create aProcurement Planning Checklist to include Modern Slavery.

**2. Contracting and policy development –** Review Shaw Trust Procurement policy, Supplier Code of Conduct and Safeguarding Policy.

**3. Raising awareness and incident reporting –** integrate our new model for incident reporting and management of concerns and incidents.

**4**. **Data and Insight –** Develop a new safeguarding dashboard to support central oversight of concerns, risk management and reportingthroughout the governance structure.

Governance Structure

Our organisational lead on Modern Slavery and Human Trafficking is the Chief Operating Officer.

We have a named lead for Safeguarding within the Board of Trustees.

We have a Group Safeguarding Lead.

Our work in relation to Modern Slavery is supported and guided within the following policies:

* Shaw Trust Safeguarding Policy and Framework.
* Prospects Safeguarding Policy.
* Ixion Safeguarding Policy and procedures.
* Safer Recruitment Policy.

Policy, performance and risk is reported and monitored through the following framework.

Responsible Recruitment

Shaw Trust have a Safer Recruitment Policy which includes the following information:

* We only use recruitment agencies who are on our preferred supplier list and have gone through our due diligence process.
* Independent teams who employees can contact, e.g. HR Support Services (HRSS) for queries.
* Provide mandatory training for hiring managers on Safer Recruitment.
* Complete background checks on new joiners – DBS and reference checks.
* Candidates must have the right to work in the UK (Right to Work ID must be provided at the offer stage). We ask this during the application process and auto reject applicants who do not have the right to work in the UK.

Training and Awareness

All Shaw Trust Staff complete a Modern Slavery training module within the first six months of working with Shaw Trust. The module is reviewed annually by the Group Safeguarding Lead.

Training completion is monitored by Shaw Trust Learning and Development Team and reported into the Audit and Risk committee quarterly.

Staff have access to information and resources from the Home Office and the Anti-slavery international organisation (www.antislavery.org) via our Safeguarding Intranet page, the Loop.

Shaw Trust provide the following information to staff throughout the year which includes Modern Slavery topics:

* Monthly ‘information pack’.
* Resources within the document hub.

Due Diligence

Shaw Trust (including its subsidiary legal entities) operate under a Supply Chain Management Framework (SCMF). The SCMF aims to set a consistent standard for the management of Supply Chain Partners (SCP) across Shaw Trust and thereby drive the behaviours required to operate to the benefit of our commissioners, adhere to key performance expectations and legislation, and seeks to ensure we are providing value for money at every stage. Within the SCMF we set out our approach to due diligence of our SCPs.

**Selection, Due Diligence & On-boarding**

When identifying SCPs for inclusion as part of our commissioner-based contracts, we will hold an Expression of Interest process led by our Partnerships Team or if new partners are required during a contract period, we will lead an Invitation to Tender procurement process.

We look for high standards and assurances regarding Modern Slavery, Safeguarding and Responsible Recruitment across our supply chain as part of this process. Ahead of onboarding a partner we will gather and assess a range of information including policies and processes which are assessed by Subject Matter Experts from across the organisation. All partners prior to onboarding are signed off by a senior leader as part of the delegated authority process.

We will always work with our commissioners and supply chain partners to ensure fair pricing to minimise the risks of Modern Slavery.

Key Performance Indicators

Shaw Trust is committed to monitor a set of key performance indicators in relation to Modern Slavery. These include:

* The delivery and monitoring of all staff and volunteers completing the mandatory Modern Slavery training module.
* Reporting and monitoring all Modern Slavery concerns raised through our central incident reporting function to the Risk and Audit committee and the Strategic Safeguarding Group through a live dashboard.

Authorised by

This statement was approved by the Shaw Trust Board of Trustees \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[on behalf of [enter any organisations or subsidiaries who have a legal obligation to complete their own statement and who are included in this statement]]

Signed by:  Date: 14 December 2023

Position: Group Chief Executive

Board of Trustees