

<b>Modern Slavery &amp; Human Trafficking Statement</b>			
Current Status	<b>Operational</b>	Last Review:	<b>Sept 2020</b>
Responsibility for Review:	<b>Group HR Director &amp; Shared Services</b>	Next Review:	<b>Sept 2021</b>
Internal Approval:	<b>SAT SET</b>	Originated:	<b>Sept 2020</b>

### 1. Purpose

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2. The Trust has a zero-tolerance approach to modern slavery. This policy outlines our commitment to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

### 2. Introduction

- 2.1. The Trust works primarily with UK-based suppliers and contractors and employees are protected under UK employment law laws and working time directives. Whilst the Trust does not conduct business in countries where there is a documented problem with human trafficking and/ or modern slavery, we remain acutely aware of the need to ensure that companies within our supply chain share our commitment to treating employees fairly and ethically.
- 2.2. The Trust is committed to the highest standards of ethical conduct in all our activities and making continuous improvements in this area. We believe that there is a low risk of slavery or human trafficking having a connection with our activities.
- 2.3. This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking both within the Trust and our supply chains to ensure that the organisation is fully compliant with the Modern Slavery Act 2015.

### 3. Structure and Supply Chains

- 3.1. This statement covers the activities of Suffolk Academies Trust and all Academies within the Trust.
- 3.2. The Trust is committed to giving young people an excellent education within a happy, caring and supportive environment.
- 3.3. Each Academy is led and run by its Principal and other senior leaders and has its own curriculum and way of doing things. Whilst there are Academies in different settings, they are predominantly in Suffolk.

**3.4.** The Trust educates 2,800 pupils and employs almost 300 teachers and support staff. The Trust's supply chains are drawn mainly from the catering, contract cleaning and education supply market.

### **4. Risk Assessment**

The Trust has assessed the risks of modern slavery and human trafficking as follows:

#### **4.1. High risk activities**

4.1.1. The Trust do not believe there to be any high-risk operations within the Trust or within their supply chain with regards to modern slavery and human trafficking.

#### **4.2. Medium risk activities**

4.2.1. Supply chains linked to the catering and cleaning provisions as a consequence of the Trust's use of external contractors.

4.2.2. Supply chains linked to the manufacture of ICT equipment or college resources, as a consequence of the Trust's use of external suppliers to provide items and the likelihood that supplies are manufactured overseas.

#### **4.3. Low risk activities**

4.3.1. Provision of agency staff predominantly in teaching and support staff.

### **5. Policies on Modern Slavery**

**5.1.** The policies we have in place and our anti-slavery statement, reflect our commitment to:

- paying people fairly and properly for their work;
- acting ethically and with integrity in all our business relationships, and;
- enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the Trust or it's supply chains.

**5.2.** All policies are reviewed by senior managers and signed off by the Board, following (where appropriate) thorough consultation with all relevant stakeholders. Policies are reviewed on a rolling basis in response to longevity, statutory or regulatory change and Academy feedback.

### **6. Due Diligence processes**

**6.1.** The Principal, or their delegate, with assistance from the SAT Executive Team and/ or Human Resources team are responsible for investigating any suspected instances of modern slavery and human trafficking. These may be escalated via the Whistleblowing Policy or via other means. All matters will be taken seriously and treated in the strictest confidence.

### **7. Recruitment and Training of staff**

- 7.1.** The Trust operates a comprehensive and transparent recruitment and selection process, incorporating the provisions of the "Keeping Children Safe in Education" guidelines.
- 7.2.** The majority of the Trust's staff are employed directly on a permanent or fixed term basis. Those successfully appointed are sourced from multiple recruitment channels which utilise a range of direct advertising, social media, databases and existing staff referrals, or via approved third party agencies.
- 7.3.** The Trust rarely use the services of an employment agency to find/ place a candidate. In such cases, the Terms and Conditions of the Agency are carefully reviewed prior to any engagement and the agency is subject to our supplier verification process.
- 7.4.** All employees who join the Trust are subject to rigorous pre-employment checks to ensure they are genuine applicants operating as free agents with the required level of propriety. These will include verification of identity, references, evidence of qualifications, criminal record disclosure and right to work checks.
- 7.5.** For roles covered by agency workers, the Trust will ensure that similar checks to those for employees are carried out. This is done by obtaining written verification from the agency that the checks have been conducted and the outcomes are satisfactory.

### **8. Fair Pay.**

- 8.1.** The Trust is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform. This is demonstrated through our commitment to ensuring staff receive, as a minimum, the National Minimum Wage, set annually by the government .

### **9. Whistleblowing**

- 9.1.** The Trust encourages all its employees, contractors and other business partners to report any concerns related to their direct activities or supply chains. This includes any circumstances that may give rise to increased risk of slavery or human trafficking. Our Whistle-blowing Policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

### **10. Measuring Effectiveness**

- 10.1.** The Trust strives to maintain the highest standards of employee conduct and ethical behaviour, all of our employment policies and procedures are set out on each academies local intranet platform in order colleagues can access them directly. It includes our 'Staff Code of Conduct and Behaviour Policy', which makes clear to employees the actions and behaviours expected of them when representing the Trust.

**10.2.** Every member of staff signs an annual declaration confirming their familiarity with our key mandatory policies – Staff Code of Conduct and Behaviour Policy, Child Protection and Safeguarding Policy and Prevent.

### **11. Procurement Practice**

**11.1.** The Trust is committed to ensuring that its key suppliers adhere to the highest standards of ethics. We recognise that modern slavery is a complex supply chain issue and suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

**11.2.** The Trust will work with its key suppliers to ensure that they meet these standards, and any serious violation of Trust's standards will lead a review and possible termination of the business relationship.

**11.3.** All major supply contracts, not ably, those identified as presenting a medium or high risk, are reviewed regularly with the results reported to the Trust Board to ensure that they are complying with the expectations of Suffolk Academies Trust.

### **12. Due Diligence.**

**12.1.** The Trust operate a due diligence process in the tendering and appointment of suppliers. This 'Modern Slavery and Human Trafficking Statement, is published on the Trust's website. We request and review a copy of the same from our high and medium risk suppliers, as well as undertaking a number of due diligence checks on them which are in line with Public Contract Regulations 2015. For suppliers where there is deemed to be an additional risk of slavery or human trafficking, supplementary checks are completed.

### **13. Our Commitment**

**13.1.** This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the Trust's Modern Slavery and Human Trafficking statement for the financial year ending 31 August 2022.

**13.2.** It has been approved by the Trust Board, who will review and update it annually.

### **14. Breaches Of This Policy**

**14.1.** Any member of staff who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

**14.2.** The Trust may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

**Revision History - Modern Slavery & Human Trafficking Statement**

Revision date	Reason for revision	Changes made
Sept 2020	New Policy	