

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

1. This statement sets out The Ted Wragg Multi-Academy Trust'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 own business and its supply chains. This statement relates to actions and activities during the financial year 1 September 2022 to 31 August 2023.
2. The Trust, as part of the education sector, recognises its responsibility towards taking a robust approach to slavery and human trafficking.
3. The organisation is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

4. The Trust is a growing Multi Academy Trust. It comprises of 13 schools serving the educational needs of circa 10,000 children and young people aged 2 to 18 and employing circa 1,700 colleagues.
5. The Trust's main activity is the delivery of education to our children and young people. Other business activities include initial teacher training, school-to-school support and income generation through lettings. The Trust's trading subsidiary (Fusion School Services Ltd) provides soft facilities management services (including catering, cleaning and grounds maintenance) to the Exeter PFI schools.
6. The Trust's educational and business activities are delivered wholly within the UK and predominantly service-based. 79% of our turnover is spent on staffing to deliver a high-quality education to our students. The Trust procures goods and services from providers predominantly based within the UK.
7. 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 our supply chains.
8. All policies are reviewed by senior managers and signed off by the Board and its committees, 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. Relevant policies are set out below:

RELEVANT POLICIES

9. The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:
10. **Recruitment and Selection Policy:** The Trust solely employs colleagues within the UK. Its recruitment practices are in accordance with Keeping Children Safe in Education. All academies have annual safeguarding audits (internal and external).

11. **Child labour:** The Trust does not employ anyone under the age of 16. Although occasional placements (usually lasting 2 weeks) for school pupils may be accepted.
12. **Providing safe / hygienic working conditions:** The Trust is committed to providing a safe working environment for all. The Trust has a range of policies and procedures in place covering building safety, staff safety and contractors. The Trust has specific reporting tools in place to enable people to report an accident or incident should the need arise, and it adheres to current health and safety legislation.
13. **Whistleblowing Policy:** The Trust encourages all its colleagues to disclose any activity which relates to danger, bribery, corruption, fraud or other unlawful unethical conduct in the workplace. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
14. **Employee Code of Conduct:** The Trust's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The Trust strives to maintain the highest standards of employee conduct and ethical behaviour.
15. **Anti-Fraud and Corruption Policy:** The Trust is committed to implementing effective measures to conduct its business activities in an honest and ethical manner, in line with its funding agreement and the Seven Principles of Public Life (the Nolan Principles).
16. **Financial Regulations and Competitive Tendering Policy:** The Trust is committed to delivering a responsible procurement policy that ensures its suppliers adhere to the modern slavery act. Any breach of the act will lead to the termination of the contract.
17. **Recruitment Agencies:** The organisation uses only specified, reputable employment agencies to source labour.

PROCUREMENT, DUE DILIGENCE AND SUPPLY CHAIN MANAGEMENT

18. Headteachers and the Executive, with the assistance of Governance and Compliance and / or Human Resources teams are responsible for investigating any suspected instances of modern slavery and human trafficking.
19. The Trust is committed to ensuring 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, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
20. The Trust will work with its key suppliers to ensure that they meet these standards; any serious violation of the Trust's standards will lead to a review and possible termination of the business relationship.
21. All major supply contracts, notably those identified as presenting a medium or high risk, are reviewed regularly with the results reported to the Trust Board to ensure they are complying with the expectations of the Trust.
22. **Suppliers:** The Trust operates a due diligence process in the tendering and appointment of suppliers. This 'Modern Slavery 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 the Public Contract Regulations 2015. For suppliers where there is deemed to be an additional risk of slavery or human trafficking, supplementary checks are completed.

RISK ASSESSMENT

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

- High risk activities: The Trust does not believe there to be any high-risk operations within the Trust or their supply chain with regards to modern slavery and human trafficking.
- Medium risk activities:
 - Supply chains linked to the catering and cleaning provisions as a consequence of using external contractors.
 - Supply chains linked to the manufacture of ICT equipment and school uniforms, as a consequence of the Trust's use of external suppliers to provide items and the likelihood that supplies are manufactured overseas.
- Low risk activities: Provision of agency staff predominantly in teaching and support staff.

24. A considerable proportion of our procurement is with suppliers who are pre-approved either by a procurement consortium, framework or appointed by means of a tender process. This mitigates risk.

RECRUITMENT

25. The Trust operates a comprehensive and transparent recruitment and selection process, incorporating the provisions of the 'Keeping children Safe in Education' guidelines.

26. 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 services which utilise a range of direct advertising, social media, databases and existing staff referrals, or via approved third-party agencies.

27. In line with our commitments to safeguarding, the Trust operates a preferred supplier group for employment agencies, with each agency agreeing to Terms of Business prior to any engagement. Agencies are selected based on their vetting policies, compliance processes, worker pay, and mandatory industry accreditation. Copies of the agency's modern slavery statement are also requested.

28. Those agencies selected to work with the Trust are reviewed regularly for best practice, and all new employment agencies wishing to be considered are reviewed against our requirements, before accepting workers from that agency.

29. 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.

30. 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. The agencies themselves will have been subject to our rigorous supplier verification process which includes due diligence on their organisation.

31. **Fair pay:** The Trust is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform.

32. This is demonstrated through our commitment to ensuring staff receive, as a minimum, the National Minimum Wage, set annually by the government. This commitment means that all staff, whether

employed directly, as contractors or through our sub-contractors, receive at least the appropriate National Minimum Wage.

TRAINING

33. The Trust requires all Academy leaders, Operations Managers, Designated Safeguarding Leads, Finance professionals, Business and HR professionals to complete training as part of our annual training program. Our statutory and mandatory training alongside functional training for colleagues with specific responsibilities, cover modern slavery in a range of ways:

- Safeguarding and safer recruitment training:
 - how to identify the signs of slavery and human trafficking;
 - what initial steps should be taken if slavery or human trafficking is suspected;
 - how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
 - how to report concerns regarding modern slavery;
<https://www.gov.uk/government/publications/modern-slavery-awareness-booklet>
- Finance and procurement training:
 - The Trust's purchasing practices, which influence supply chain conditions are designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.

MEASURING EFFECTIVENESS (PERFORMANCE INDICATORS)

34. The Trust strives to maintain the highest standards of employee conduct and ethical behaviour and our policies enhance our commitment to act ethically and with integrity throughout our schools. Policies and procedures are kept under review to make sure they reflect the changing needs of the Ted Wragg Multi-Academy Trust and of the staff, students and the communities it serves.

OUR COMMITMENT

35. 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 2022/23.

Moira Marder, Chief Executive Officer