

# Modern Slavery Statement



**Review Date**

January 2024

**Ratified**

January 2024

**Next Review**

January 2025

**Responsible Colleagues**

Trust Board

# Our Trust

*These four critical questions make it clear who we are and what we do.  
We ask ourselves these questions to guide our work and our improvement.*

## Why do we exist?

To **transform life chances** by achieving the highest possible standards and preparing all our students to lead successful lives.

## How do we behave?

- **Hard work**  
*We are determined to see things through to the end and are resilient when faced with challenges.*
- **Integrity**  
*We do the right thing because it is the right thing to do.*
- **Teamwork**  
*We work together to help everyone succeed.*

## What do we do?

- We educate, safeguard and champion all our learners.
- We set high standards for ourselves and our learners.
- We build the powerful knowledge and cultural capital which stimulate social mobility and lifelong learning.

## How will we succeed?

1. Aligned autonomy
2. Keeping it simple
3. Talent development

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# 1 | Introduction

- 1.1 Modern slavery is a crime and 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. We take a zero-tolerance approach to modern slavery and ensure we act ethically and with integrity in all our business dealings and relationships. We are committed 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 | Organisation Structure and Supply Chains

- 2.1 Academy Transformation Trust operates 20 academies and is responsible for the education of 11,660 students within primary and secondary education, and over 1,500 in further education. We employ over 1,800 staff. Each academy is led and run by its Principal and senior leaders. Our current academies are located in Essex, Nottinghamshire, Norfolk, Sandwell, Staffordshire, Stoke on Trent, Suffolk, Thurrock, Walsall and Warwickshire.
- 2.2 Our supply chains are drawn mainly from the catering, cleaning, estates management and education sectors, all based within the UK. We procure goods and services from third party providers predominantly based within the UK.

# 3 | Policies in Relation to Slavery & Human Trafficking

- 3.1 The policies we have in place and this statement reflect our commitment to act ethically and with integrity within all our business relationships and to implementing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## 4 | Due Diligence Process

- 4.1 Staff are encouraged to raise concerns about any issue or suspicion of modern slavery or child labour in any parts of our business or supply chains at the earliest possible stage with their manager or report it in accordance with our Whistleblowing Policy as soon as possible. Academy Principals or a member of the Executive Leadership Team will oversee any required investigations.
- 4.2 The prevention, detection and reporting of modern slavery in any part of our delivery or supply chains is the responsibility of all those working for or contracted by ATT and staff are required to avoid any activity that might lead to or suggest a breach of this statement.
- 4.3 All contractual arrangements stipulate the need to comply with our commitment and with the principles of the Modern Slavery Act within the tendering and delivery process. Our procurement policies and frameworks are clear about this, and should suppliers fail to meet the minimum requirements or be unwilling to make changes then we would ultimately cease to trade with them.

## 5 | Risk Assessment & Management

- 5.1 We have assessed the risks of modern slavery and human trafficking and do not believe there to be any high risks with the operations within our trust or supply chain. Supply chains linked to the external contractors for the cleaning and catering within our academies and to the manufacture of our ICT equipment and school uniforms are viewed as a medium risk due to the use of external contractors. The provision of temporary and agency staff are viewed as a low risk.
- 5.2 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. We also have a Procurement Policy that strongly emphasises ethics and contains procedures to ensure that ethics are embedded in procurement practice.
- 5.3 All suppliers are subject to a due diligence process and wherever possible we use government recommended frameworks. We use a selection questionnaire when engaging with new suppliers and require their details of Investors in People, ISO and training requirements as well as confirmation that suppliers meet minimum wage and other legal requirements.
- 5.4 Procurement is subject to internal audit review, as well as assessment by our external auditors annually.

- 5.5 We operate a transparent recruitment and selection process incorporating the provisions of the *Keeping Children Safe in Education* guidelines. We operate a preferred supplier group for employment agencies who agree terms of business before their services are engaged.

## 6 | Measuring the Effectiveness of Steps Being Taken

- 6.1 Our policies are reviewed regularly by the Executive Leadership Team and the Board of Trustees.
- 6.2 Our Risk Register is regularly reviewed at academy level, Trust-wide, and at Board level to ensure full transparency.

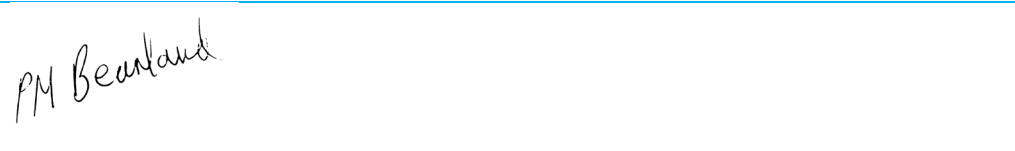
## 7 | Training & Recruitment

- 7.1 All appointed staff (either directly or through agencies) are subject to rigorous pre-employment checks which include the verification of their identity, right to work in the UK, qualifications, DBS and references. Staff interviewing candidates will hold the appropriate level of “Safer Recruitment” training certified at the appropriate level.
- 7.2 Safeguarding is at the core of ATTs’ ethos and awareness of the importance of this matter is emphasised through safeguarding training undertaken by all employees and signposting to the organisation’s *Safeguarding Policy* and this statement. There is also the requirement for an annual declaration from all staff to confirm they have read and understood the Safeguarding Policy and training.
- 7.3 Appointed staff complete an induction which includes the provision of all our policies and guidance.
- 7.4 **Fair Pay**  
We are 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. This commitment means that all staff, whether employed directly, as contractors or through our sub-contractors, receive at least the appropriate National Minimum Wage.
- 7.5 **Whistleblowing**

We encourage all our 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 Whistleblowing Policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

## 8 | Our Statement

- 8.1 This Statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 8.2 This statement is made pursuant to section 54 of the *Modern Slavery Act 2015* and constitutes our slavery and human trafficking statement for the financial year ended 31 August 2023 with Trustee approval on 23 January 2024.

Signature	
Name	Patricia Beanland
Date	22 February 2024