



ACET MODERN SLAVERY STATEMENT

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Business Lead	CPO	Author	Gemma Shore
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1. INTRODUCTION

ACET is a multi-academy trust comprising nine primary and three secondary academies in South Yorkshire and Derbyshire. We are a values-based trust, which regards the opportunity to make a difference to the lives of almost 6,000 children and young people as an absolute privilege. Working with over 800 employees, we strive to build strong partnerships with parents/carers and the 12 local communities in which our academies are located

ACET is an exempt educational charity, subject to company law and is a not for profit organisation. The Board of Trustees is the legal governing body of all academies within the Multi Academy Trust and remains accountable in law and to OFSTED and the Education and Skills Funding Agency for the exercise of its functions. Its Trustees, who are appointed on a voluntary basis, are drawn from the public and private sector, and bring significant educational and other professional expertise.

The Trust is committed to combatting modern slavery and human trafficking within the Trust and its supply chain and ensuring full compliance with the Modern Slavery Act 2015. The Trust is an equal opportunities employer, fully committed to creating and ensuring an inclusive and respectful working environment for all our staff to feel confident that they can report concerns without any risk to themselves.

2. STRUCTURE AND SUPPLY CHAINS

This statement covers the activities of ACET and all 12 of its academies.

The Trust is responsible for the leadership, governance and performance of a wide range of academies. As an established multi-academy trust with a track record of success, we strive for excellence in order to make a difference to children's life chances through the provision of a first-class quality of education for all, where all members of the ACET community are safe.

The Trust works primarily with UK based suppliers and contractors and employees are protected under UK employment law and working time directives. We remain aware of the need to ensure that the Trust and companies within our supply chain share our commitment to treating employees ethically and with integrity.

We work to the highest professional standards and comply with all laws, regulations, and rules relevant to our business. We expect the same high standards from those we work with and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all of our charitable and business relations.

3. RISK MANAGEMENT

Risk management is embedded throughout the Trust's operations, with any risks identified and mitigations being shared with the Trustees through the Audit and Risk Committee. The Trust engages with an independent Internal Audit service who review and report on adherence to policies and procedures. Non-compliance, if identified, is reported to the Board of Trustees through the committee.

The Trust has assessed its risks of modern slavery and human trafficking and has included below specific activities that may be considered as a risk to the Trust:

High risk

- 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.

Medium risk

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

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

4. OUR POLICIES ON MODERN SLAVERY

We have reviewed our existing policies and procedures in light of the Act. We are confident that our policies promote good behaviour among our colleagues at work and within our Trust. Our policies and procedures are kept under review to make sure that they reflect the changing needs of the Trust and of the staff, students/pupils and the communities it serves.

Among the policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act are:

- Complaints Policy;
- Equality, Diversity and Inclusion Policy;
- Safer Recruitment Policy (including the recruitment of ex-offenders);
- Staff Code of Conduct;
- Whistleblowing Policy;
- Anti - Fraud Policy;
- Gifts and Hospitality Policy;
- Competitive Tendering Policy;
- Safeguarding and Child Protection Policy

The whistleblowing policy also draws attention to the risk of modern slavery or human trafficking and we would expect employees to report any concerns in relation to those matters under the protection of the whistleblowing policy.

All tenders for supply of services and or goods include a requirement for the supplier to report on their ethical trading including ensuring they also comply with the Modern Slavery Act 2015.

5. RECRUITMENT AND EMPLOYMENT PRACTICES

We have discussed the Act, its purpose and the Trust's attitude to it at a Board of Trustees meeting. We have alerted the CEO and central leaders to it and challenged them to continue to consider where the risk of modern slavery or human trafficking may arise in the Trust.

Our recruitment processes include rigorous pre-employment checks for all new employees. These include checks on identity, right to work in the UK, references, qualification, checks with the Disclosure and Barring Service and overseas checks where appropriate. We must ensure that all applicants are genuine and acting freely. Similar checks will be carried out when using Supply Agencies.

The Trust is committed to ensuring all employed and contracted staff receive fair remuneration for the job they perform. We pay staff in line with national negotiated pay frameworks; teachers are paid in accordance with the School Teachers' Pay and Conditions Document (STPCD) and support staff are paid in line with the

National Joint Council (NJC) rates. The Trust is also committed to paying above the voluntary National Living Wage.

Our employment policies and procedures are compliant with employment law. The Trust has close links with the local authorities in which our academies are situated, and works collaboratively with recognised Trade Unions.

6. TRAINING AND AWARENESS

Every member of staff, whether or not they are based in an academy, is made aware of the contents of this policy. In addition, ACET also has a Whistleblowing Policy which is well publicised to all staff and in all ACET premises, which enables those with concerns about any wrongdoing or breaches of law, to raise these concerns in confidence without fear of recrimination.

Throughout the year the annual safeguarding training plan across the Trust includes a detailed focus upon on early identification of those at risk of exploitation and training to help all staff know what to do if they become aware of any potential risks. We are fully satisfied that through our robust safeguarding training that staff could identify and act appropriately for at risk students/pupils, staff, and contractors.

7. PROCUREMENT AND SUPPLY CHAIN

The Trust's Competitive Tendering Policy makes reference to the Modern Slavery Act in relation to procurement.

We recognise that, as a purchaser of goods and services, we have the opportunity to influence good practices in the employment of people by other organisations. We do not enter business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour. We have included within all tender documents the need for suppliers to report on whether they are compliant with the Act and as part of our due diligence we request copies of their Modern Slavery and Human Trafficking Statement.

We will continue to ensure that our suppliers always provide a safe working environment and act ethically. Where a high or medium risk is identified we will carry out a review during the contract to ensure the suppliers remain compliant. Where we believe a supplier is not adhering to this Act, this could lead to the termination of a supplier's contract. This includes ensuring compliance with the government published National Living/Minimum Wage. We will continue to enhance the assurances we seek from suppliers as to their avoidance of modern slavery and human trafficking.

8. SAFEGUARDING

We take safeguarding incredibly seriously in upholding our statutory duties and striving to safeguard staff and pupils through a culture of safeguarding in everything we do. We have a Chief Safeguarding Officer on the ACET Central Team as well as Designated Safeguarding Leads and deputies in every academy. Collectively these colleagues work together to implement policy and secure excellence in safeguarding practice across the Trust. Each academy proactively works with the local authorities, the local safeguarding partnerships, the LADO (Local Authority Designated Officer) and local stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking. Their good practice is shared amongst the academies and the focus of safeguarding training always includes detailed training about early identification of those at risk of exploitation with a specific focus around vulnerable children.

The quality and impact of our safeguarding practice is reviewed at every level of Trust governance. Safeguarding policy and practice is reviewed at Local governing body meetings every half term. A programme of internal audit of Safeguarding is undertaken by the Chief Safeguarding officer and external partners contribute as and when required. The Audit and Risk Committee is responsible for ensuring compliance across the trust and the Chief Safeguarding Officer meets regularly with the Safeguarding Trustee to provide additional assurances.

Safeguarding is an agenda item at every full Board of Trustees Meeting, and we have a named Trustee with responsibility for Safeguarding and Named Governors for Safeguarding at each academy.

Our Safeguarding and Child Protection and Policy is reviewed annually by the Chief Safeguarding Officer and the Board of Trustees. It is fully compliant with all statutory requirements and guidance set out in Keeping Children Safe in Education and Working Together to Safeguard Children.

9. OUR COMMITMENT

The Trust has noted the requirements of the Modern Slavery Act 2015 (the "Act"). This statement is made on behalf of ACET and has been approved by the Board of Trustees and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Signed (CEO): _____

Signed (Chair of Trust): _____

Dated: _____

Dated: _____