

# Ormiston Academies Trust Modern Slavery and Human Trafficking Statement

## Policy version control

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## 1. Introduction

- 1.1. Modern slavery is a crime that affects millions of individuals around the world. The Modern Slavery Act 2015 defines these offences as those of ‘slavery, servitude and forced or compulsory labour’ and ‘human trafficking’.
- 1.2. Ormiston Academies Trust (hereafter referred to as OAT or “the Trust”) is committed to ensuring that there is no slavery or human trafficking in our supply chains or any part of our business. The processes set out below reflect the Trust’s commitment to acting ethically and with integrity across the organisation.
- 1.3. The Trust works primarily with UK-based suppliers and contractors and employees are protected under UK employment legislation 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.
- 1.4. Whilst we believe that there is a low risk of slavery or human trafficking having a connection with our activities, the Trust is committed to the highest standards of ethical conduct in everything we do and we will continue to undertake improvements in this area, whenever we identify opportunities to do so.
- 1.5. This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking both within the Trust and within our supply chains, to ensure that the organisation is fully compliant with the Modern Slavery Act 2015.

## 2. Structure and Supply Chains

- 2.1. This statement covers the activities of OAT and all 45 Academies within our Multi Academy Trust. The Trust is committed to giving young people an excellent education within a happy, caring, and supportive environment.
- 2.2. Each Academy is led and run by its Principal and other senior leaders and has its own curriculum and way of doing things. Our Academies are located in many different settings, including coastal, inner city and suburban areas.
- 2.3. The Trust educates c35,000 pupils and employs around 5,700 teachers and support staff. The Trust’s supply chains are drawn mainly from the IT, Estates, HR, Transportation and education supply markets.

### 3. Risk Assessment

3.1. 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 within their supply chain with regards to modern slavery and human trafficking.

#### Medium risk activities

Supply chains linked to the catering and cleaning provisions because of the Trust's use of external contractors.

Supply chains linked to the manufacture of ICT equipment and school uniforms, because 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.

### 4. Policies on Modern Slavery

4.1. 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
- enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the Trust or in our supply chains.

4.2. All policies are reviewed by Trust Executives 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 or employee feedback.

### 5. Due Diligence Processes

5.1. Individually, employees are responsible for notifying their line manager should they become aware of any activities, either within the Trust or by any of its external suppliers or partners, that is not compliant with this Statement.

5.2. Trust Executives, Education Directors, and Academy Principals, with assistance from

the Governance and Compliance and/or Human Resources team are responsible for investigating any suspected instances of modern slavery and human trafficking.

## 6. Whistleblowing

- 6.1. The Trust encourages all its employees, contractors, and other business partners to report any concerns related to their direct activities or supply chains, without fear of retaliation or recrimination. This includes any circumstances that may give rise to increased risk of slavery or human trafficking.

## 7. Recruitment 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”.
- 7.2. 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.
- 7.3. Agency staff are subject to the same checks, which are completed by their agency, with confirmation being provided to the OAT cover manager. The agency checks are recorded on the single central register at academy level.
- 7.4. The Trust is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform.
- 7.5. The Trust pays due regard to advice issued by recognised trade unions and other national bodies as appropriate, along with relevant statutory legislation, when considering remuneration.
- 7.6. In line with our prioritised tender programme commitments, OAT is currently developing a Trust-wide agency tender strategy for employment agencies, with a view to establishing a series of applicable contracts. The resulting contract(s) will include due consideration of agency vetting policies, compliance processes, worker pay and industry accreditation. Conditional acceptance of OAT's modern slavery and human trafficking statement will also be part of this process, which will be monitored and verified on an annual basis.

## 8. Procurement Practice

- 8.1. The Trust adheres to the requirements of Procurement Act 2023 including compliance to the mandatory and discretionary exclusion grounds in relation to Modern Slavery as covered in Schedules 6 and 7 of the legislation.
- 8.2. 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. OAT makes it a mandatory requirement for a supplier to confirm if they meet the criteria for the Modern Slavery Act to apply. If so, they are required to produce a slavery and human trafficking statement for each financial year. In addition, each supplier is required to confirm that they specifically agree with the Trust's position on anti-bribery, anti-slavery, and human trafficking, as part of their response to a centrally issued tender.
- 8.3. The purchase order template used by OAT includes a requirement for all suppliers to comply with OAT's referenced policies and strategies, including OAT's statement on modern slavery and human trafficking.