



Modern Slavery Act Statement

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Trust Mission Statement

The Glory of God is a human being fully alive! (St Irenaeus)

Human flourishing and the uniqueness of every individual as a child of God is at the heart of our Catholic educational enterprise. In this context, a human being fully alive is one who is open to faith – to love – to joy – and to learning. They are daily becoming the person God created them to be and they are ready to delight in their God-given gifts, and to use them in the service of the Common Good.

‘Together, excellent. Together, fully alive!’



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1. Introduction

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers and can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

St Thomas Catholic Academies Trust ("the Trust") is committed to the highest standards of ethical conduct. This includes a commitment to prevent and eliminate any form of modern slavery and/or human trafficking in its business activities and its supply chain.

This statement sets out the steps the Trust has taken, during the financial year ending 31 August 2022 to address the risk of modern slavery within our business activities and the steps the Trust will take to combat modern slavery and human trafficking to address the requirements of the Modern Slavery Act 2015.

2. Organisational Structure

St Thomas Catholic Academies Trust was founded in 2020 and brought together two Trusts under the Diocese of Northampton - St Alban Catholic Academies Trust and St Peter's Catholic Academies Trust. The Trust now numbers 14 schools (12 Primaries/Junior/Infant and 2 Secondaries) across Bucks, Central Beds, Luton and Slough and has approximately 956 employees.

The Trust is committed to providing the very best Catholic education and aims for its pupils and students to be happy, safe and inspired to flourish spiritually, socially and academically.

3. Countries of Operation

The Trust only operates within England and our contractors and suppliers and predominantly UK based.

4. Our supply chains

The Trust's supply chain includes suppliers of educational materials, school uniforms, catering, maintenance, cleaning, furniture, equipment, stationery, ICT hardware, construction, consultancies and recruitment agencies.

The Trust works predominately with UK based suppliers and contractors who employees are protected under UK employment law. Although the Trust does not conduct business in countries where there is active human trafficking and/or modern slavery, the Trust is aware of the need to ensure that companies within our supply chain share our commitment to treat their employees in a fair and ethical way.

5. Trust Policies

The Trust has the following policies which promote the anti-slavery and human trafficking practices

- Procurement Strategy/Policy/Financial Regulations – Provides a framework of governance and steps to ensure all procurement activity is compliant to legislation and best practice including transparency of our supply base.
- Child Protection Policy and Safeguarding – The aim is to provide a safe and secure environment for children and provides a framework for our schools to identify and support students who are at risk of modern slavery, trafficking or exploitation.

This legal requirement together with the Catholic values and principles that under the Trust mean that it is essential that the Trust ensures not only compliance at local level but also assumes a strategic responsibility to ensure that safeguarding practices are robust and effective in safeguarding and protecting the welfare of all children and young people in its care.

All schools within the Trust has a Designated Safeguarding Lead and Designated Safeguarding Governor. Safeguarding is reported on at every Local Academy Committee meeting, every Directors' Curriculum and Standards Committee and at every Board meeting.

The Trust follows each local authority's safeguarding procedures set up by the Local Safeguarding Children Board (LSCB). Child Protection and Safeguarding policies are based on the Department for Education publication "Keeping Children Safe in Education" and all employees are required to read and understand this document as well as undertake annual Safeguarding refresher training.

- Recruitment and Selection Policy – To ensure staff that are recruited to the Trust are subject to rigorous statutory checks. Where agency staff are used, only reputable agencies are allowed on our approved supplier base and are subject to mandatory due diligence checks.
- Whistleblowing Policy – This policy provides a mechanism for encouraging employees to report concerns about potential wrongdoings, including modern slavery risks, without fear of reprisals, victimisation or subsequent discrimination. It is intended to encourage and enable employees to raise serious concerns within the Trust. It is recognised that cases may have to proceed on a confidential basis. The Whistleblowing Policy is extended to enable Governors, Volunteers and Contractors/Suppliers to also voice their concerns.

6. Risk Management

Risk management is embedded in the day-to-day practice within the Trust. Potential risks have been identified and documented and are reviewed regularly by the Strategic Executive Leader, the Finance, Audit & Risk Committee and the Board as a whole to ensure continuous compliance and improvement.

The Trust is committed to ensuring the safety of pupils, students and employees and has in place appropriate strategies, policies and procedures to help mitigate against risk.

We are confident that, by working together with our suppliers, we can aim to ensure that they adhere to the same high standards in the prevention of slavery and human trafficking.

7. Actions taken to date/Next Steps

- Implementation of a Trust-wide Employee Code of Conduct policy and procedure to assist in the prevention of slavery and human trafficking.
- Centralisation of Finance and HR Services allowing data to be accessed centrally.
- Trust-wide Risk Register in place and reviewed regularly by SEL/Finance, Audit & Risk Committee/Board.
- Ongoing: Centralised procurement of high-risk contracts to limit risk and exposure to suppliers and contractors operating outside of this policy.
- Ongoing: As part of a review, develop supplier approval and due diligence processes, request that potential suppliers declare that their supply chains are free from slavery and human trafficking. This is reviewed regularly as part of our Procurement Policy. In line with guidance set out from ESFA.
- Ongoing: As part of our recruitment processes, safer recruitment procedures are in place.

Next steps:

- Develop a Supplier Code of Conduct – suppliers will be required to sign up to our supplier code of conduct before being accepted onto our supply base. These will include commitment to Ethics and Sustainability within the supplier's own supply base.
- Rationalising of our supply base and centralised supply chain management through Procurement. To reduce the risk of inappropriate suppliers and ensure the Trust holds up to date supplier data including relevant supplier policies and assurances.

- Procurement and Contract Management Training – ensure all staff responsible for the procurement of goods and services are provided with adequate training on supply chain ethics.

