



Modern Slavery Act Statement

APPROVED BY: Board of Directors

PREPARED BY: CFOO

DATE: July 2025

NEXT REVIEW DATE DUE BY: July 2026

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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Introduction

This statement is made on behalf of the St Thomas Catholic Academies Trust (STCAT) Multi-Academy Trust (company number 09660515) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. This statement relates to actions and activities during the year Sept 2024 – August 2025.

Modern slavery 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.

Modern slavery and human trafficking are criminal offences to which STCAT has a zero tolerance approach. 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 and the steps the Trust will take to combat modern slavery and human trafficking to address the requirements of the Modern Slavery Act 2015.

STCAT is committed to preventing modern slavery and human trafficking in all aspects of our operations and supply chains. We recognize our responsibility to uphold ethical standards and ensure transparency in our practices.

Organisational Structure

STCAT 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. As a Multi-Academy Trust comprising 17 schools, we provide education to a diverse student body across Buckinghamshire, Central Bedfordshire, Luton and Slough and has approximately 1300 employees. The list of our academies can be found on our website

STCAT has two main areas of operations:

- A national level which oversees the business as a whole;
- A local level – e.g., an individual academy.

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.

Our supply chains

While our primary focus is education, we outsource certain services, to third-party providers. We acknowledge the potential risks associated with outsourcing and are committed to working with suppliers who share our values and commitment to combating modern slavery.

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.

Our procurement regulations set out the requirements we have in relation to our engagement with suppliers. Our suppliers are expected to comply with all local and national laws and regulations. This includes paying their staff the minimum wage, and any on-site staff passing a DBS (Disclosure & Barring Service) check. Should suppliers fail to meet our minimum requirements, or be unwilling to make any changes, we may cease to trade with them.

Trust Policies

The following key policies and documentation detail our approach to protecting our pupils and staff from modern slavery and ensuring our supply chains are free from modern slavery.

- 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 have 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.
- Single Central Record (SCR), Personnel Files and Safer Recruitment Policy - this policy applies to the recruitment and selection of teaching staff (including Headteachers, Deputy and Assistant Headteachers) and support staff in schools and academies. The policy also covers checks schools should undertake when using agency staff and volunteers.
- 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.
- Staff Code of Conduct - Outlines our expectations for ethical behaviour among all employees
- School's Complaints Policy - aims to ensure that a concern, difficulty or complaint is managed confidentially, sympathetically, efficiently and at the appropriate level, and resolved as soon as possible.

These policies are regularly reviewed to ensure their effectiveness and relevance.

Due Diligence and Risk Management

Risk management is embedded in the day-to-day practice within the Trust. Potential risks that are identified are documented and are reviewed regularly by the Strategic Executive Leader and Chief Financial & Operations Officer, the 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.

Procurement is subject to internal audit review, as well as assessed by our external auditors annually. Frameworks via public sector buying organisations are considered for all tenders and these meet the requirements of the Modern Slavery Act 2015 by default. In the event we opt not to use an existing framework all tenders go through Head of Procurement at which point the modern slavery risk will be considered and incorporated into the tender evaluation criteria.

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.

In line with best practice and due diligence we will

- Conduct risk assessments of our supply chains to identify and mitigate potential areas of concern.
- Require suppliers to confirm their adherence to the Modern Slavery Act 2015 and provide evidence of their own anti-slavery measures.
- Include clauses in contracts that permit audits and assessments of supplier practices.

Training and Awareness

We believe that education is pivotal in preventing modern slavery. Therefore:

- Every member of staff, whether or not they are based in an academy, is trained on our policies and is required to declare annually that they have read and understood the policy and their training. All staff are made aware of and have access to our Whistleblowing Policy which enables those with concerns about any wrongdoing or breaches of law, to raise these concerns in confidence without fear of disciplinary action.
- Annual Safeguarding training takes place every September and must be undertaken within the first month for any employees joining throughout the year
- We are fully satisfied that through our robust safeguarding training that staff could identify and act appropriately for at risk pupils, staff, and contractors.

Monitoring and Review

Our commitment to combating modern slavery is ongoing. We regularly review our policies, supplier relationships, and training programs to ensure their effectiveness. Feedback mechanisms are in place to capture concerns and continuously improve our approach.

Next Steps

Next steps:

- As part of our recruitment processes, safer recruitment procedures are in place.
- We publish our Supplier standard terms and conditions to ensure providers looking to contract with us are aware of our standards – 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.
- 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.
- Strengthening future supplier contracts – All new supplier agreements with industries will include explicit provisions that we will not engage with any suppliers who subcontract or delegate work to third parties

without our knowledge and approval. This is to ensure full transparency and accountability throughout our supply chain

- 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.
- Continue to build awareness within our Trust as to the importance of these essential controls within our Supplier Management, to uphold our ethical responsibilities, rather than to prohibit school's access to supplies.
- We have completed a desk-based audit of our key suppliers' statements to reassure ourselves they continue to operate in accordance with the requirements of the act. No areas of risk were identified.
- Enhance visibility of support for potentially at risk individuals, including access to confidential advice and support.

Approval

This statement has been approved by the Board of Trustees of St Thomas Catholic Academies Trust and will be reviewed annually.