



# Statement of Modern Slavery and Human Trafficking

---



# Statement of Modern Slavery and Human Trafficking

Date	March 2023
------	------------

## Introduction

This statement constitutes the modern slavery and human trafficking transparency statement for Trinity Multi-Academy Trust and is designed to satisfy the requirements of Section 54 of the Modern Slavery Act 2015.

We are committed to the highest standards and the continuous improvement of ethical conduct in all our activities. This is the organisation's initial Modern Slavery Statement and focuses on the work undertaken or due to be completed over the current academic year.

## About Trinity Multi-Academy Trust (TMAT)

TMAT was established in 2015. It now contains ten academies covering from primary phase through to post-16 education, and is growing. The trust has seen numerous educational changes but one thing has remained constant - we know what works, and so we have formed a group of like-minded schools to make a positive difference on a wider scale. The more young people we can support, the better. That is as complicated as we allow it to become. Our Church of England MAT is open to schools of all faiths and none.

## Risk Management and Assessment

Directors and Senior Leaders have formally identified and documented the major risks to which TMAT is exposed. Those risks are reviewed by the Audit Committee and the Board of Directors on a regular basis. There is a formally documented risk management strategy and associated procedures, which have been implemented to ensure risk management is embedded in our day-to-day processes.

Our internal auditors carry out regular testing of internal procedures and controls including adherence to policies and procedures. Any non-compliances are included in internal audit reports, which are communicated to senior management and the Audit Committee. As part of the Whistleblowing Policy the internal audit team will investigate any allegations of impropriety.

## Procurement and Supply Chain Management

We have identified that some of our procurement takes place within sectors where modern slavery offences could occur, such as the construction and buildings maintenance industry, catering supply, grounds maintenance supply, cleaning supply, school uniform supply, stationary supply, supply teaching staff and ICT supply chains. As a trust we carry out a robust **due diligence** process on our current contractors, who are required to check an individual's right to work in the UK and carry out a DBS check prior to hiring staff to work in our schools. 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. When one of our academy's is selecting a new supplier, we will consider potential suppliers ethical trading policies and review their code of conduct for suppliers as part of the selection process. When engaging contractors for construction projects our contracts require the contractors to comply with the Modern Slavery Act 2015 and ensure compliance by all subcontractors. During this year, our Chief Operating Officer has undertaken training, via iHASCO, on the topic and has reviewed with the trust's Procurement Manager, supplier terms and conditions, to ensure we terminate an agreement with immediate effect if a supplier breaches our requirements in relation to Modern Slavery Act 2015 compliance.

We will continue to seek assurances from suppliers as to their avoidance of modern slavery and human trafficking.

## Policies and Procedures

TMAT has **Safeguarding and Child Protection** policies in place which focus on the need to ensure that its pupils are safe, feel safe and are fully supported in this respect by their academies. These policies provide a framework for our academies to develop secure processes for identifying and supporting pupils at risk of abuse. The academy's Safeguarding Policy and Child Protection Procedures (section 3.4) specifically identifies modern slavery and trafficking as forms of harm and provides guidance for staff who believe a child is at risk of harm.

Principals, together with Designated Safeguarding Leads, are required to ensure that staff and Governors have safeguarding and child protection training that is regularly updated (at least annually via the EduCompli App and iHASCO). Staff also receive regular safeguarding and child protection updates and have access to up to date, relevant information in relation to forms of neglect and abuse. Safeguarding children who may have been trafficked forms a part of this training. Our academies have processes in place to ensure that the voice of the child is heard and that pupils are able to disclose any concerns they may have. If children are persistently absent from school the reasons for this will be investigated. Each academy has a link Governor for safeguarding and they undertake regular visits with staff and report back their findings to the Local Governing Body (LGB) of that specific academy, these findings are discussed and actions agreed that are followed up.

TMAT has a range of **HR policies** in place which ensure the provision of an open, honest and transparent working environment for all colleagues, prospective colleagues, and others working in or visiting its premises. We are committed to ensuring all colleagues are treated with dignity and respect and are able to carry out their job role free from conflict, risk, harassment or any other behaviour perceived to be compromising, demeaning or demoralising. New staff receive appropriate training regarding the trust policies and procedures.

It is a statutory requirement for all academies to undertake certain recruitment and vetting checks on individuals working within their establishment and to maintain a live Single Central Record of these checks. Therefore, all our schools and the central office are able to demonstrate that vetting checks, including proof of right to work in the UK, have been carried out for all staff. These vetting checks have been extended given the update in guidance from the Department for Education in September 2022 to include media checks.

The TMAT **Whistleblowing Policy** places a duty on all employees to report instances of impropriety, including, but not limited to, criminal activity and improper conduct. The policy sets out a clear process for reporting such concerns and provides protection for individuals who do so. TMAT is committed to ensuring that any concerns of this nature are taken seriously and investigated.

## Culture and Training

TMAT is committed to continuous improvement both of its staff and processes. Culturally the trust has a zero tolerance to modern slavery and human trafficking from a legal, moral and ethical point of view. The trust ethos - *'To make a positive difference to the lives of as many young people as possible'*, is at the core of the zero-tolerance approach to the topic.

The MAT will raise awareness of the modern slavery and human trafficking statement via staff communication and training. All staff will undertake annual safeguarding refresher training, which includes the topic, and staff are tested on their understanding from the learning activity, which is recorded and can be evidenced.

Additionally, staff who have responsibility for purchasing and supply chain related activities have access to further iHASCO training on the topic, which again tests their understanding of the learning and is recorded in their staff training record.

## Planned Activities

During the academic year 2022/23 we will continue to raise awareness amongst central office colleagues and school business managers of the risks of modern slavery occurring within our supply chains, which is an ongoing action now and for the future.


Where appropriate, staff will be assigned the iHASCO training module on modern slavery and human trafficking, which, once completed, will be recorded on their staff training record and an objective for compliance will be assigned and reviewed in their annual performance appraisal.

The MAT will continue to monitor guidance updates from the Department for Education and the Government and update policies and procedures as required, including but not limited to: procurement and supply chain guidance, safeguarding guidance, and human resources guidance.

## Approval of the statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the academic year 2022/23.

Mr Tom Miskell (Chair of the Board of Directors)

Signed:  Date: 27-3-2023