



Modern Slavery Statement

Approved by: Donna Kinderman **Date:** March 2023

Last reviewed on: March 2023

Next review due by: 1st March 2024

VERSION HISTORY

Version	Approved By	Revision Date	Description of Change	Author
Version 1.0	Donna Kinderman	1st March 2023	N/A	Andrew Adams

Statement under the UK Modern Slavery Act for the year ending 31 December 2023

▪ Introduction

Spencer Academies Trust remains committed to the highest standards of ethical conduct and to both preventing and eliminating any form of modern-day slavery or human trafficking within its operations and contract supply chain.

Spencer Academies Trust works predominantly with UK-based suppliers, wherein workers are protected under UK employment laws. Companies within our supply chain share our commitment to treating all their employees fairly and ethically.

This statement outlines the steps the Trust takes to understand all potential modern slavery risks and to ensure our organisation is fully compliant with the Modern Slavery Act of 2015.

▪ About Spencer Academies Trust

The Spencer Academies Trust (the Trust) is a growing Multi-Academy Trust with both primary and secondary academies located across Nottinghamshire, Derbyshire and Leicestershire. As of 1 March 2023, The Trust has a total of 26 schools.

The Trust employs some 2,600 teaching and support staff and has approximately 16,000 students across its academies.

▪ Our Aims and Commitment

To ensure the Trust fulfils its statutory responsibilities as defined under the Modern Slavery Act 2015, we aim to:

- Demonstrate the Trusts' commitment to combatting modern slavery and human trafficking;
- Educate and raise awareness of modern slavery and human trafficking amongst colleagues, students, parents and carers;
- Clearly communicate the steps the Trust takes to ensure such practices within its entire business operation are neither present nor tolerated;
- Outline the procedures the Trust has in place and or intends to put in place to ensure its current and future suppliers, including their sub-contractors, can demonstrate to the Trust that they are not knowingly engaged in any practices associated with modern slavery and/or human trafficking.

▪ Trust Policies and Due Diligence with respect to Modern Slavery and human trafficking within the Trust's business

The Trust has reviewed its policies and procedures with respect to its statutory and moral obligations under the Modern Slavery Act 2015. We remain confident that they address, where necessary, the Trust's and its suppliers' statutory obligations with respect to employee exploitation, slavery and human trafficking.

Relevant policy documents and web links are referenced below:

- **Safer Recruitment and Selection Policy**. Our recruitment processes are set out in our Safer Recruitment & Selection Policy (last revised 1 September 2020), which ensures that all prospective employees are legally entitled to work in the UK.
- **Whistleblowing Policy**. Through this policy, the Trust encourages staff, students, parents, governors, suppliers, third parties and business associates to report any concerns of potential wrongdoing of which they may become aware.
- **Equality & Diversity Policy**. This policy promotes Spencer Academies Trust's commitment to equality and diversity and reaffirms our adherence to a common set of values and objectives. It additionally sets out a consistent approach to communicating, implementing and monitoring equality and diversity goals within the Trust. The policy recognises the four types of unlawful behaviour: direct discrimination, indirect discrimination, harassment and victimisation.
- **Health & Safety Policy**. This defines the Trust's health and safety management, including but are not limited to: employee safety, tenant safety, safety of non-employees (contractors, members of the public, etc), compliance with legal duties, avoidance of legal actions (civil and criminal) and avoidance of fines and other costs associated with defending a legal action and the protection of commercial reputation.

- **Due diligence in relation to slavery & human trafficking in its supply chain**

The Trust buys a wide range of both goods and services in accordance with current public procurement legislation and our own sourcing principles and policies. Goods and services bought by the Trust include, but are in no means limited to, capital construction projects, furniture, paper, IT equipment and support infrastructure services, groundworks maintenance, electronic and audio-visual equipment, books, photocopying services, waste management and disposal, water, gas and electricity supply, and educational supplies and equipment to suit the teaching syllabi.

These are procured in accordance with current public procurement legislation and our procurement statement within the Trust's Financial Regulations Policy. All Trust tender documents, contracts and SLAs now explicitly detail the Trust's expectation that all bidders confirm they abide by and understand their statutory requirement with respect to the Modern Slavery Act of 2015. The Trust takes a zero-tolerance approach to all forms of employee exploitation, modern slavery and human trafficking and will terminate any supplier agreement(s) where it is shown the supplier has knowingly, directly or indirectly, supported or allowed worker exploitation to occur within its operations or those of its suppliers.

The Trust is fully committed to its responsibilities under the Modern Slavery Act 2015. To support this commitment, a dedicated Procurement Officer was recruited in March 2022.

- **Training and awareness-raising**

The Trust will ensure that its current policies and policy revisions continue to implement best practices in addressing modern slavery and human trafficking across the entire operation of the Trust. The Trust also commits to a complete review and update of its procurement policy and procedure to further strengthen its commitment to said practices and ensure ethical sourcing practices are embedded throughout its supply chain.

The Trust will continue to raise awareness of the Modern Slavery Act of 2015 to staff, pupils, parents and suppliers.

The Trust will continue to deliver training for all staff on child sexual exploitation, radicalization and extremism, and safeguarding and educate our students on slavery and human trafficking, both past and modern.

This policy statement is made pursuant to section 54(1) of the modern Slavery Act 2015 and constitutes the Spencer Academies Trust modern slavery and human trafficking policy and statement for the academic year ending 31st December 2023.

[This policy statement applies to all persons working for the Spencer Academies Trust (SAT) or on behalf of SAT in any capacity, including employees at all levels, directors, governors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third part representatives and business partners. It does not form any part of any employee's contract of employment.

Modern slavery is a crime and a violation of an individual's fundamental human rights. Modern slavery can take many forms, including slavery, servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Trust has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our own business or through our supply chain partners.

We are committed to ensuring there is transparency in our own business and our approach to tackling modern slavery throughout our supply chains and consistency within our statutory obligations under the Modern Slavery Act 2015.

The Trust expects the same high standards from all of our contractors, suppliers and associated business partners and, as part of our procurement and contracting process, we include specific references to adherence to the Modern Slavery Act 2015. We expect our suppliers to uphold their suppliers or sub-contract partners to these same high standards and statutory requirements.

As a family of schools, we are committed to raising awareness of modern slavery and human trafficking through our work with our students and ensuring that our staff engaged in family support and child protection roles are equipped to deal with cases involving students which may contravene the Modern Slavery Act 2015 or relate to human trafficking.]

Signature:



Name:

Donna Kinderman

Position:

Chair of Board of Directors

Date:

09-03-23