

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024-2025

### INTRODUCTION

1. This statement sets out The Ted Wragg Multi-Academy Trust's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 September 2024 to 31 August 2025.
2. The Trust, as part of the education sector, recognises its responsibility towards taking a robust approach to slavery and human trafficking.
3. The organisation is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

4. The Trust is a growing Multi Academy Trust. It comprises of 17 schools serving the educational needs of circa 13,290 children and young people aged 2 to 18 and employing approximately 2,079 colleagues (current numbers in September 2024).
5. The Trust's main activity is the delivery of education to our children and young people. Other business activities include initial teacher training, school-to-school support and income generation through lettings. The Trust's trading subsidiary (Fusion School Services Ltd) provides soft facilities management services (including catering, cleaning and grounds maintenance) to a number of our schools.
6. The Trust's educational and business activities are delivered wholly within the UK and predominantly service-based. 79% of our turnover is spent on staffing to deliver a high-quality education to our students. The Trust procures goods and services from providers predominantly based within the UK.
7. 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, and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the Trust or our supply chains.
8. All policies are reviewed by senior managers and signed off by the Board and its committees, 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 feedback. Relevant policies are set out below:

### RELEVANT POLICIES

9. The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:
10. **People Policy:** The Trust solely employs colleagues within the UK. Its recruitment practices are in accordance with Keeping Children Safe in Education. All academies have annual safeguarding audits, with external quality assurance.

11. **Child labour:** The Trust does not employ anyone under the age of 16. Although occasional placements (usually lasting 2 weeks) for school pupils may be accepted.
12. **Providing safe / hygienic working conditions:** The Trust is committed to providing a safe working environment for all. The Trust has a range of policies and procedures in place covering building safety, staff safety and contractors. The Trust has specific reporting tools in place to enable people to report an accident or incident should the need arise, and it adheres to current health and safety legislation.
13. **Whistleblowing Policy:** The Trust encourages all its colleagues to disclose any activity which relates to danger, bribery, corruption, fraud or other unlawful unethical conduct in the workplace. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
14. **Employee Code of Conduct:** The Trust's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The Trust strives to maintain the highest standards of employee conduct and ethical behaviour.
15. **Anti-Fraud and Corruption Policy:** The Trust is committed to implementing effective measures to conduct its business activities in an honest and ethical manner, in line with its funding agreement and the Seven Principles of Public Life (the Nolan Principles).
16. **Financial Regulations and Competitive Tendering Policy:** The Trust is committed to delivering a responsible procurement policy that ensures its suppliers adhere to the modern slavery act. Any breach of the act will lead to the termination of the contract.
17. **Recruitment Agencies:** The organisation uses only specified, reputable employment agencies to source labour.

## RISK ASSESSMENT

18. The Trust engages with sectors identified as being at the high risk of modern slavery, and these risks can occur irrespective of supplier size and contract value.
19. Although modern slavery can affect virtually any industry and economic sector, there are a number of core characteristics that place workers at heightened risk of being exploited. These characteristics are set out below and are used to identify which activities may be at higher risk.

- i. Industry Type

Industries at high risk of modern slavery occurring include:

- Construction
- Manufacturing and electronics
- Garment/ textile production, including footwear
- Food processing
- Services, including the hospitality, security services, cleaning and catering
- Logistics, including warehousing, transport

They are often characterised as labour intensive and/or involving raw materials.

- ii. Nature of workforce

High risk characteristics associated with the nature of the workforce include:

- Reliance upon low-skilled or unskilled labour – typically work that is low-paying and undervalued and often undertaken by vulnerable workers.
- High numbers of temporary, seasonal, or agency workers – worker vulnerability is heightened by employment uncertainty. Women workers and children are particularly vulnerable.
- Dangerous or physically demanding work.
- Isolation of workers – due to working in rural locations, being home-based or in unmonitored and unregulated environments.

### iii. Supplier location

Although modern slavery can occur anywhere in the world, there are some countries where the risk is predicted to be higher. Suppliers from these countries can often be part of supply chains within the UK.

### iv. Context in which the supplier operates

- Inadequate labour laws and regulations in the country of origin with little or no-enforcement
- Presence of cheap labour and high numbers of vulnerable workers – this may include women, children and young workers, migrants, minorities, groups with a history of discrimination or exclusion of workers with disabilities
- Absence of effective grievance mechanisms and representative workers' organisations / collective agreements.
- A lack of business and/or government accountability
- Widespread discrimination against particular groups e.g. women or certain ethnic groups
- Wars/conflicts
- High levels of poverty and unemployment

### v. Commodity Type

Goods which have a higher likelihood of being produced by child labour or forced labour in violation of international standards include:

- Polysilicon
- Rubber gloves
- Garments
- Electronics
- Fish
- Textiles
- Timber

### vi. Business / supply chain model

Sub-contracting and complex supply chains – the larger and more complex the supply chain, the harder it is for organisations to know about conditions for workers in their supply chains

Complex employment relationships with a reliance on agency, outsourced or subcontracted workers adds another layer of separation between employers and workers, leaving workers exposed to unethical practices

Use of labour recruiters in supply chains – recruitment and hiring through labour brokers can increase the risk of trafficking and forced labour due to the prevalence of corrupt practices and recruitment fees

Purchasing that is predicated only on a profit margin matrix (i.e. rapid turnaround times/high flexibility for production/low margins for large quantities of goods, depending on unreliable trends - can leave workers vulnerable to exploitative practices). The Trust has assessed the risks of modern slavery and human trafficking below.

20. The Trust has identified the following activities as having an increased risk with regards to modern slavery:

- Supply chains linked to the catering and cleaning provisions as a consequence of using external contractors
- Supply chains linked to the manufacture of ICT equipment and school uniforms, as a consequence of the Trust's use of external suppliers to provide items and the likelihood that supplies are manufactured overseas
- Provision of agency staff predominantly teaching and support.

21. The Trust mitigates modern slavery risks in its commercial activity through due diligence of suppliers as part of a tender process, and through the appointment of pre-approved suppliers by a procurement consortium, or framework.

## PROCUREMENT, DUE DILIGENCE AND SUPPLY CHAIN MANAGEMENT

### **New Procurements**

22. The Trust addresses modern slavery risks during the procurement process in the following ways:

- Risk assessment (see section 18-21)
- Pre-procurement & Specification: Design new procurements in line with the associated risk level.
- Selection Stage: Use the mandatory and discretionary exclusion grounds as set out in the Standard Selection Questionnaire.  
For high-risk procurements, Part 1 and 2 declarations are requested for supply chain members.
- Award Stage: Apply tender response questions relating to modern slavery where they link to the specification, taking a proportionate approach.
- Contract Conditions: Consider including specific terms and conditions to strengthen contractual protection.

### **Existing Contracts**

23. The Trust is committed to ensuring its suppliers adhere to the highest standards. We recognise that modern slavery is a complex issue and suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

24. Following contract award, The Trust will:

- Map the supply chain of high-risk contracts to establish specific risks

- Continually work in collaboration with suppliers on high-risk contracts to mitigate risks, monitor progress, and put action plans in place to mitigate the risks identified

## RECRUITMENT

25. The Trust operates a comprehensive and transparent recruitment and selection process, incorporating the provisions of the 'Keeping children Safe in Education' guidelines.
26. The majority of the Trust's staff are employed directly on a permanent or fixed term basis. Those successfully appointed are sourced from multiple recruitment services which utilise a range of direct advertising, social media, databases and existing staff referrals, or via approved third-party agencies.
27. In line with our commitments to safeguarding, the Trust operates a preferred supplier group for employment agencies, with each agency agreeing to Terms of Business prior to any engagement. Agencies are selected based on their vetting policies, compliance processes, worker pay, and mandatory industry accreditation. Copies of the agency's modern slavery statement are also requested.
28. Those agencies selected to work with the Trust are reviewed regularly for best practice, and all new employment agencies wishing to be considered are reviewed against our requirements, before accepting workers from that agency.
29. 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.
30. For roles covered by agency workers, the Trust will ensure that similar checks to those for employees are carried out. This is done by obtaining written verification from the agency that the checks have been conducted and the outcomes are satisfactory. The agencies themselves will have been subject to our rigorous supplier verification process which includes due diligence on their organisation.
31. **Fair pay:** The Trust is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform.
32. This is demonstrated through our commitment to ensuring staff receive, as a minimum, the National Minimum/Living Wage, set annually by the government. This commitment means that all staff, whether employed directly, as contractors or through our sub-contractors, receive at least the appropriate National Minimum/Living Wage.

## TRAINING

33. The Trust requires all leaders, operations managers, designated safeguarding leads, finance professionals, business and HR professionals to complete training as part of our annual training program. Our statutory and mandatory training alongside functional training for colleagues with specific responsibilities, cover modern slavery in a range of ways:
  - Safeguarding and safer recruitment training:
    - how to identify the signs of slavery and human trafficking;
    - what initial steps should be taken if slavery or human trafficking is suspected;
    - how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;

- how to report concerns regarding modern slavery:  
<https://www.gov.uk/government/publications/modern-slavery-awareness-booklet>
- Finance and procurement training:
  - The Trust’s purchasing practices, which influence supply chain conditions are designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country’s national minimum wage, or the provision of products by an unrealistic deadline.

#### MEASURING EFFECTIVENESS (PERFORMANCE INDICATORS)

34. The Trust strives to maintain the highest standards of employee conduct and ethical behaviour and our policies enhance our commitment to act ethically and with integrity throughout our schools. Policies and procedures are kept under review to make sure they reflect the changing needs of the Ted Wragg Multi-Academy Trust and of the staff, students and the communities it serves.

#### TAKING ACTION WHEN VICTIMS OF MODERN SLAVERY ARE IDENTIFIED

35. Headteachers and the Executive, with the assistance of Governance and Compliance and / or Human Resources teams are responsible for investigating any suspected instances of modern slavery and human trafficking.

36. If a victim of modern slavery is identified, The Trust will involve law enforcement agencies, with any incident where the victim is in the UK and in immediate danger, being reported to the police by dialling 999.

37. The Trust will work collaboratively with any supplier to address instances of modern slavery and will only terminate a contract as a last resort.

#### OUR COMMITMENT

38. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the Trust’s Modern Slavery and Human Trafficking statement for the financial year 2024/25.

39. This ‘Modern Slavery Statement’ is published on the Trust’s website

Moira Marder, Chief Executive Officer