

Approved: April 2024

Date to be Reviewed: April 2025



## Modern Day Slavery Statement

### **Introduction**

This statement is made on behalf of St Mary's Academy Trust pursuant to the section 54(1) of the Modern Slavery Act 2015 and constitutes the Trust's modern slavery and human trafficking transparency statement as of January 2024.

The Trust is committed to continuously improving our practices to ensure that modern slavery and human trafficking are not present within our own organisation or our supply chains. We strive to act ethically and with integrity in all our activities.

This statement explains the steps that have been taken by the Trust to date and how we plan to continue developing and implementing a proactive approach to the prevention of modern slavery.

### **Our Business**

We are a small Barnsley based Trust of nine primary schools with a vision to ensure lifelong learning for all our communities by building a better future together and for all to be treated as equals; we believe in *every child, every family, every day*.

Our **Approach** is as follows: -

Through our curriculum offer, we strive to foster confidence and delight in our pupils, allowing them to seek wisdom and knowledge which will provide them with the skills to shape their lives well.

We aspire for our schools to open up horizons and instil hope for our pupils and guide them to reach their full potential. We understand that pupils will also need to be equipped with the skills of forgiveness and repair to be able to face challenges within their life.

Our curriculum supports children to explore their own ideas and beliefs, develop a moral understanding, a confidence to express appropriate opinions and a respect for each other.

At St Mary's Academy Trust, we believe in education for all, our pupils, our staff, and our community. Through positive relationships, by demonstrating care and compassion, we enable people to flourish together.

### **Our Supply Chain**

Procurement of quality goods and services, including catering, grounds maintenance, ICT hardware, and construction, is an important part of ensuring that we can succeed in delivering educational excellence to each child in our schools. More so, the Trust is committed to ensuring that our supply chains remain free of slavery and has implemented measures to help achieve this for instance,

- Including an anti-slavery clause in our standard form contracts (which we use where possible with our key suppliers); this requires our suppliers to ensure that they are complying with the Act and associated legislation.
- Raising awareness with senior employees who procure goods.

Approved: April 2024

Date to be Reviewed: April 2025

## **Slavery and Human Trafficking Policies**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or within the organisation itself. Thus, we are committed to continued policy development to ensure that we keep up to date with all changes in legislation, including full compliance with the Modern Slavery Act.

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all of our business relationships and when implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the Trust and in our supply chains.

It is a condition of our contracting process that all key sub-contractors can demonstrate full adherence to key employment legislation. This aims to ensure that the welfare and well-being of all employees working or participating in work on our school premises are fully protected.

The Trust has a wide policy framework that supports the aims of the Modern Slavery Act, this includes, however is not limited to the following: -

- Child Safeguarding Training
- Mandatory Training
- An Anti-Fraud, Bribery and Corruption Policy - Whistleblowing Policy
- A Grievance Policy
- A Recruitment & Selection Policy
- Pay Policies
- Procurement and Contracting Policy
- Discrimination, Harassment and Bullying Policy

## **Due Diligence Process**

We undertake due diligence processes across the Trust and within our supply chains at the time of renewal to: -

- Identify inappropriate employment practices
- Identify, assess, and monitor other potential risk areas
- Mitigate the risk of slavery and human trafficking occurring
- Protect whistle-blowers

We undertake due diligence when considering taking on new suppliers, and by reviewing our existing suppliers on a periodic basis.

Our due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

Approved: April 2024

Date to be Reviewed: April 2025

### **Raising Awareness**

All employees were informed as the policy was circulated when launched and the statement issued accordingly. This information is also included as part of the induction process for all new employees and throughout the year, various communications/activities take place to raise awareness with colleagues.

### **Culture and Training**

The ethical and moral culture that the Trust promotes is part of every employee's training from their initial induction until they leave the organisation. This culture ensures that employees feel confident in flagging any failings that they may encounter while working for the organisation, including the Modern Slavery Act. Our Whistleblowing Policy further encourages staff to report concerns in the workplace.

To ensure a good level of understanding of the risks of modern slavery and human trafficking in the Trust and in our supply chains, we deliver appropriate training to our senior leadership team and central office staff to provide the skill and knowledge to those staff responsible for procurement to recognise the key issues and risks and how these must be addressed. We are committed to promoting and maximising awareness of modern slavery risks across our organisation.

### **Measuring Effectiveness – Supplier Adherence to Our Values and Ethics**

We have a zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we operate in line with principles of responsible sourcing, including paying employees at the prevailing minimum wage applicable within their relevant county of operations. Our supply chain compliance programme is maintained and consists of reviews; audits; and self-certification declarations.