

# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Policy Number: 99 Version Number: 01

Ratified by Trustees: 13<sup>th</sup> September 2023 Next Review Date: 13<sup>th</sup> September 2024

Link: Mr J Lowe

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### Introduction

This statement is made on behalf of the Wade Deacon Trust (Company Number 08278808) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Trust's slavery and human trafficking statement. This statement relates to actions and activities during the financial year 1 September 2023 to 31 August 2024. Wade Deacon Trust recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is committed to preventing slavery and human trafficking within its activities and to ensuring that its supply chains are free from slavery and human trafficking. This statement sets out Wade Deacon 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 business and supply chains.

### **Organisational Structure and Supply Chains**

Wade Deacon Trust is a multi-academy trust (MAT) working across the North West of England with a vision for every school in the Trust to be an outstanding school where every child receives an exceptional education. A list of academies within Wade Deacon Trust can be found on the Trust website (www.wadedeacontrust.com). The majority of the Trust's direct supply chains are UK based and key supply areas cover catering, cleaning, supply teachers, other agency staff and volunteers. A small number of suppliers are based in Europe and the United States of America, primarily in relation to the purchase of IT supplies. Two of the Trust schools are contracted to a Private Finance Initiative (PFI).

# Organisational Policies

Wade Deacon Trust is committed to ensuring that there is no modern slavery or human trafficking in any of its schools or any aspect of its business. Wade Deacon Trust is committed to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its business. The following key policies and documentation detail the Trust's approach to protecting pupils and staff and ensuring our supply chains are free from modern slavery and trafficking:

- Slavery and Human Trafficking Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- Child Protection and Safeguarding Policies
- Competitive Tendering Policy

In addition, the Trust works closely with a Joint Consultation and Negotiation Committee to help reduce risk through discussion of working and pay practices.

## Due Diligence

Wade Deacon Trust regularly reviews its new supplier processes and never knowingly issues contracts to suppliers who do not adhere to the Modern Slavery Act 2015. Though there has never been any instance to date of any supplier falling short of demonstrating high enough standards in their robust anti-slavery policies, if found, their contract with the Trust would be terminated immediately.

Wade Deacon Trust takes all reasonable steps to assess and manage the risk around supply chains which may be at risk of breaching the Modern Slavery Act 2015. These include catering, construction and cleaning agencies which may employ overseas staff to work long hours on low salaries. Language barriers, for example, may inhibit workers from understanding their right to employment rights including minimum wage.

## **Assessing and Managing Risk**

To identify and mitigate risk in its schools, the Trust has put in place initiatives to identify and assess risk areas. Initiatives are also in place to mitigate the risk of slavery and human trafficking occurring in its schools and to protect whistle blowers.

Wade Deacon Trust appoints Designated Safeguarding Leads and link governors for safeguarding in every school to ensure all pupils in its care are protected as far as possible from harm in line with the Keeping Children Safe in Education 2020 (KCSIE) guidance. The Trust's Child Protection and Safeguarding Policy is reviewed annually and approved by the Trust Board.

### **Performance Indicators**

When agreeing Performance Indicators and Strategic Aims the Trust acknowledges the risk of exposure to Modern Slavery and Human Trafficking. To mitigate these risks, Performance Indicators and Strategic Aims do not focus on lowest cost and fastest shipping, which can unintentionally increase the risk of creating an environment of modern slavery through the supply chain.

The Trust is committed to paying all employees the Living Wage Foundation rate, and never knowingly enters into contracts with suppliers who contravene employee rights. Regular reviews of supply chains are undertaken to gain assurances that contracted employees are protected.

# Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the Trust's schools and across its business, training and updates are provided to staff and governors. New employees and governors are provided with this information when they first join Wade Deacon Trust.