

Modern Slavery Act Statement 2024-25



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Approved by:	Directors
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Policy Statement

This policy outlines Manor Multi Academy Trust's ('we' / 'our' / 'us') response to the provisions of Section 54 of the [Modern Slavery Act 2015](#) (the 'Act') and constitutes our slavery and human trafficking statement.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are committed to preventing slavery and human trafficking within our activities and to ensuring that our supply chains are free from slavery and human trafficking.

We are committed to equality and value diversity. As such we are committed to fulfilling our Public Sector Equality Duty (Equality Duty) obligations and expect all staff and volunteers to share this commitment.

This policy should also be applied in accordance with our Staff Code of Conduct, Dignity at Work, Safeguarding and Child Protection, Safer Recruitment, and ICT Acceptable Use policies and Procedures. For staff, copies of all policies and procedures can be accessed via the **All MAT Staff** area on Teams. For parents and members of the public, relevant policies are available upon request and where not required to be published on our website.

The Equality Duty requires us to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, and victimisation.
- Advance equality of opportunity.
- Foster good relations between people who share protected characteristics, such as age, gender, race and faith, and people who do not share them.

If you consider that any of our practices, policies or procedures may be indirectly discriminatory, you should report your concerns and the basis for them to us; we will take appropriate action and ensure that you receive a written response in respect of the concerns that you have raised.

This statement does not form part of staff contracts of employment. We reserve the right to amend or withdraw this statement at any time.

We are responsible for ensuring the effective implementation of this statement. As part of equality monitoring we will review and monitor the operation and impact of the statement on a regular basis and in accordance with the statement review date. As part of this monitoring and review this statement will be equality impact assessed.

Scope

This statement applies to employees, workers, agency workers, consultants, casual workers, contractors and volunteers, whether during working hours or otherwise.

Organisational structure

We operate in the education sector, developing a family of schools where empowered leaders place our learners at the heart of everything and all are supported to be successful. We operate across the West Midlands, with schools reporting into the Executive Leadership Team (ELT), headed by the Chief Executive Officer (CEO) and the Chief Executive Advisor (CEA). Our ELT report to our Directors, who bear ultimate legal responsibility for our activities.

We are an exempt educational charity and a company limited by guarantee. Our Directors have accountability for all schools within our Trust, which currently consists of 9 schools:

- Brindley Heath Junior School Academy
- East Park Academy
- Foley Infant School Academy
- Foxyards Primary School
- Hateley Heath Academy
- Hill Avenue Academy
- Manor Primary School
- St Alban's CE Primary Academy
- St Thomas' CE Primary Academy

We have over 300 employees in our organisation.

Our approach

We work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. We expect the same high standards from those we work with and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all of our charitable and business relations.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have a continuous and rigorous process for reviewing and updating processes and policies, with a wide policy framework that supports the aims of the Act:

- Safer recruitment training & policy
- Safeguarding training & policy
- Whistleblowing Policy
- Staff Grievance Policy
- Staff Pay Policies
- Financial Procedures
- Equality Information & Objectives Statement and People Strategy

Identifying and addressing risks

We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact us:

1. Matters of a safeguarding nature, which covers child sexual exploitation or human trafficking, and can directly impact our pupils and/or potentially affect the staff of our contractors; and
2. Our supply chain and the vendors we contract.

Supply chain

Our procurement regulations set out our requirements in relation to our engagement with suppliers. Our suppliers are expected to comply with all local and national laws and regulations. This includes paying their staff the minimum wage, and any on-site staff passing a DBS check. We publish our standard terms and conditions at the point of procurement to ensure providers looking to contract with us are aware of our standards. Should suppliers fail to meet our minimum requirements, or be unwilling to make any changes, we may cease to trade with them.

The great majority of the goods and services we purchase are from within the UK and EU, where employment legislation is generally both reasonably comprehensive and enforced. All procurement is undertaken by considering best value, where decision-making is not driven by cost. Large contracts are appointed under tendering arrangements, which are reviewed in line with Government frameworks. We therefore believe that the risk of modern slavery in our supply chain is relatively low.

The majority of our supplies are procured from suppliers who have obligations under regulatory bodies and/or are also within the remit of the Act. As such, we are satisfied that our current tendering and procurement processes are sufficient.

Although the risk is considered low, we remain diligent to the risk and continue to review and improve our policies regularly.

Procurement is subject to internal audit review, as well as assessed by our external auditors annually. We are moving towards the predominance of contracts being appointed via frameworks which meet the requirements of the Modern Slavery Act.

Safeguarding

We take safeguarding incredibly seriously in upholding our statutory duties and striving to safeguard staff and pupils through a culture of safeguarding in everything we do. We have a Designated Safeguarding Lead (DSL) in every school. Collectively, these colleagues work together to implement policy and secure excellence in safeguarding practice across the Trust. These colleagues are experienced in this area and model excellent practice for all staff. Through their encouragement, each school proactively works with the local authorities, the LADO (Local Authority Designated Officer) and local stakeholders to combat safeguarding

issues, including child sexual exploitation and human trafficking. Their good practice is shared across our Trust and the focus of safeguarding training always includes detailed training about early identification of those at risk of exploitation. Colleagues take part in Safeguarding Network meetings on a termly basis.

The quality and impact of our safeguarding practice is reviewed at every level of Trust governance. Safeguarding policy and practice is reviewed annually across our Trust.

Safeguarding is an agenda item at every Directors' meeting as well as Parent and Community Advisory Forum meetings, and we have a named Director allocated to the role of Safeguarding Advocate for the Trust.

Our Safeguarding and Child Protection is reviewed annually by the ELT and Directors. It is fully compliant with all statutory requirements and guidance set out in [Keeping Children Safe in Education](#).

Training

Every member of staff is trained on the Safeguarding and Child Protection Policy and is required to declare annually that they have read and understood the policy and the training received. In addition, we have a Whistleblowing Policy which enables those with concerns about any wrongdoing or breaches of law to raise these concerns in confidence without fear of disciplinary action.

Throughout the year, our annual safeguarding training plan includes a detailed focus on early identification of those at risk of exploitation and training, to help all staff know what to do if they become aware of any potential risks. We are fully satisfied that through our robust safeguarding training, staff could identify and act appropriately for at risk pupils, staff and contractors.

This is not an area for complacency, however, and we keep under close scrutiny and evaluation our safeguarding policies and practice. This enable us to refine and develop excellence in all we do, and in this Modern Slavery Act Statement we recognise that the lasting impact of the Covid-19 pandemic is not to be underestimated, as we continually enhance the knowledge of our staff to prevent slavery and human trafficking and child sexual exploitation.

We evaluate our processes for raising concerns to ensure that there are clearly identified ways to report fears of whistleblowing or modern slavery which are available to all users of our schools.

Reporting

To date, no referrals have been made in relation to modern slavery.