



The Diocese of Ely

ACT Multi
Academy
Trust
**Agapé, Courage
Thankfulness**

Trust Policy Statement on Modern Slavery and Human Trafficking

Our vision

As a growing trust, we are looking to work with other schools and like-minded leaders in order to increase our reach and ability to change education and improve pupil life chances. Our approach to growth is one of collaboration in which we believe that every school can play a central role in co-constructing the future of the MAT because together, with input from all, we are stronger.

Our mission

When we set up the MAT we were very clear that we were not going to target a set number of schools because, for us, it is about the quality of how we operate rather than focusing on the volume of schools we are working with.

We believe in growing capacity within each school and celebrating their individuality – we have decided that we want to nurture individuality rather than impose a set blueprint on every school that works with us. Each school is unique and that should be celebrated. Where schools want support and advice then the Trust will ensure that this happens.

One of the underlying foundations of how we operate is that we want to encourage schools and their staff to take risks, embrace when things don't go according to plan and then evaluate and refine their practice.

No school is perfect and ACT Multi Academy Trust certainly isn't, but our key strength is our ability to embrace mistakes and use them as a learning opportunity for improvement.

We believe that operating as a MAT gives us a bright future where we work with a range of people who share similar philosophies.

Our work

At ACT our goal is to create a MAT which links like-minded schools together to create an inspiring learning experience for all of the children – regardless of which school they attend.

Our driving principle is that we want to work with schools who have an open mindset and are interested in breaking some of the traditional approaches to education.

We pride ourselves on innovation, taking risks and operating creatively. It is important that, regardless of Ofsted grades, we work with schools who believe in deviating from the educational norm and instead choose to be part of a collective team that creates a system that we fully believe in.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes ACT Multi Academy Trust's modern slavery and human trafficking transparency statement as of February 2024. 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.

Organisational Structure

ACT Multi Academy Trust operates in the education sector, a group of church schools in Cambridgeshire and Peterborough, with plans to grow over the coming years. Our schools provide an their own bespoke curriculum for the children within our Trust. When they transition to Secondary School, our goal is for them to have a secure understanding of the world around them with clear understanding for the Environment, their role as global citizens and Community. Our schools offer enrichment experiences to develop pupils as a whole, caring equally about academic and personal development.

To ensure this, professional development opportunities are provided for our teachers and school leaders. All staff ultimately report through their line managers to the CEO, who has oversight of compliance with all relevant legislation including the Modern Slavery Act 2015 (the Act). The CEO and the Central Team report to the trustees of the Trust who bear ultimate legal responsibility for the Trust's activity.

ACT Multi-Academy Trust uses a number of suppliers to support our operations and activities. Our suppliers are predominantly UK based and are therefore required to be compliant with UK legislation. These suppliers mostly provide services relating to education, catering, stock resourcing, training and development, recruitment, IT delivery and support, agency workers, consultants, travel and professional services. We also procure a limited amount of goods in the form of school and office supplies, furniture, IT hardware and other materials used in our day-to-day operations.

Our Supply Chains

A considerable proportion of our procurement is with suppliers who are pre-approved either by a purchasing consortium such as Crown Commercial Services (CCS) and Crescent Purchasing Consortium (CPC), or appointed through means of a formal tender process. Our supply chains include:

- education equipment, textbooks and resources suppliers
- estate management maintenance and services
- ICT equipment and services
- catering services and supplies
- cleaning services and supplies
- peripatetic music services
- supply/agency staff

We have identified that some of our procurement takes place within sectors where modern slavery offences could occur, such as within our cleaning and catering supply chains and within the construction industry. We will be taking the following steps to promote awareness of this during 2022/23:

- Continuing to raise awareness amongst National, Regional and Academy based teams involved in employment, procurement and management, of the risks of modern slavery occurring within our supply chains
- Include compliance with the Modern Slavery Act and Living Wage Accreditation as a condition or criterion in specification and tender documents wherever possible
- Ensure our supplier on-boarding process includes due diligence around adherence to the Modern Slavery Act 2015

- Ensure suppliers have access to our standard Terms & Conditions which require compliance to the Modern Slavery Act. Our standard form contracts (which we use where possible with our key suppliers) include an anti-slavery clause; this requires our suppliers to ensure that they are complying with the Act and associated legislation.
- Look for supplier aggregation opportunities in high-risk areas, such as cleaning, to better manage the risks associated with Modern Slavery
- Work closely with key partners to better understand how they are managing risks associated with Modern Slavery
- Consult with our recognised Trade Unions

The CFO will be completing the CIPS Ethical Procurement and Supply Chain Training and will then act as the modern slavery 'champion' across the charity.

The Trust utilises an external/internal Audit provider to evaluate and make recommendations to improve the overall effectiveness of risk management, control and processes across the Trust.

The Trust is interested in exploring the process of becoming an accredited Living Wage provider. As part of this pledge, we commit to paying the current living wage to all directly employed staff, including employees, agency/temporary workers, and casual workers.

When recruiting temporary workers, we utilise the services of recruitment suppliers, all of whom are reputable agencies and with whom we have agreed Terms and Conditions for each appointment. These suppliers and terms are reviewed annually. To minimise any risk, we have taken the following steps to ensure that such recruitment complies with the Act:

- We have reviewed the pay structure for all temporary agency staff to ensure conformity with the national Real Living Wage.
- Our agreements ensure that suppliers provide the necessary 'right to work' checks for all temporary staff.
- Our agreements ensure that we are fully compliant with agency worker regulations including that, after 12 weeks in an assignment, charge rates are automatically raised in line with the regulations.

Policies and Processes

ACT Multi-Academy Trust is 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.

It is a condition of our tendering and 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 are fully protected.

As part of our high value/risk tender processes, all major sub-contractors are required to warrant to the Trust that they are fully compliant with all employment, equality and environmental legislation and that, where applicable, they are compliant with the annual reporting requirements contained within section 54 of the Modern Slavery Act.

In order to support the aims of the Modern Slavery Act, all ACT Multi Academy Trust staff are required to complete annual Child Safeguarding, equity, diversity and inclusion and data training and be familiar with the following policies:

- Safeguarding Policy,
- Gifts and Hospitality Policy,
- Whistleblowing Policy,
- Grievance Policy,
- Pay Policy,
- Code of Conduct and Purchasing,
- Procurement and Competitive Tendering Policy.

Due Diligence and Risk Management

As part of the procurement and contracting process with all key sub-contractors and suppliers, the Trust carries out detailed financial and legal due diligence checks for all large supply arrangements.

The Trust and its schools also carry out risk assessments for programmes and projects with external providers within the Trust. These include due diligence measures such as gathering information, assessing information and consulting relevant groups who may be impacted. These are constantly reviewed by senior management within our schools to ensure their continued effectiveness in managing any risk.

Due to the nature of the sector that ACT Multi-Academy Trust operates in, and the close regulation and supervision it receives from UK Governmental departments, the likelihood of compliance issues occurring is very low. The majority of our contracts are predominantly UK based and with whom we have established long-term working relationships. Prior to contract award we complete robust due diligence checks on these companies.

The Finance Team completes an annual risk mapping exercise of current suppliers across our schools which includes a RAG rating of all key suppliers in relation to the risks of modern slavery. Where applicable they check all our key suppliers to ensure that they have a robust Modern Slavery statement in place.

We have identified that activities employing staff on a temporary/casual basis could present an increased risk. These activities are carried out by a small number of suppliers and we believe the risk to be low as a result of the internal processes we have implemented with suppliers in these industries, as described above.

The Purchasing, Procurement and Competitive Tendering Policy, continues to assess and review areas of the Trust's operations where the Act could be contravened through ongoing risk identification and supply chain management. Any suppliers identified as being from high-risk industries or locations will be further monitored while they remain part of our supply base. Where any risks are identified they will be escalated to the CEO and Director of Finance and Operations. Suppliers will be contacted to agree a time-bound action and improvement plan which will be closely monitored on a regular basis.

ACT Multi Academy Trust will not accept donations from organisations or individuals whose principal business is considered to be in conflict with the Trust's aims and policies, including modern slavery and human trafficking. We apply a consistent and rigorous approach to our due diligence screening for suitability when working with new corporate partners and donors.

Culture and Training

ACT Multi Academy Trust is funded from a range of public sources and is committed to ensuring that the maximum value, benefit, and impact is achieved from the funding that we receive. Value for money is seen as a key performance indicator and it is essential for the prosperity and reputation of the Trust that we are able to evidence that our funding is being used in the most effective way. The ethical and moral culture that the Trust promotes is part of the values and aims of the organisation. We encourage our employees to speak up, remain focused and succeed together. All employees are required to complete mandatory child safeguarding and equality, diversity and inclusion training annually.

As a Trust working to achieve equality in the education system, we require that every prospective candidate for employment with us can demonstrate their belief in our values as part of our recruitment process. 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.

Incidents in 2023

To date, there have been no reported incidents of modern slavery by ACT Multi Academy Trust or suppliers to the Trust in 2023.

Planned activities

Over the next 12-18 months we will continue to build on the work already done to further develop our anti-modern slavery policies and procedures. Planned activities include:

- Inclusion of responsible procurement principles (including a Supplier Code of Conduct) within our procurement framework; we will raise awareness across the organisation by launching this via internal communication channels and externally via our website.
- Implementation of a supplier/relationship management framework to clarify roles and responsibilities and provide guidance on effectively managing key supplier contracts across the organisation.
- Providing specific Modern Slavery Act guidance and training to key individuals across the organisation who are responsible for managing significant contractual relationships.
- Issuing the supplier questionnaire, collating responses, escalating any current or emerging risks and following up as required.

Next Review Date	February 2025	Version	1	Approval Date	09/02/23
Review Cycle	2 years	Owner	AA	Approval Body	Trust Board