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Modern Slavery Statement

Financial Year ending
31 August 2022



Document Detail

<u>Document Type:</u>	HR Policy
<u>Document Name:</u>	Modern Slavery Statement
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Approvals

Name	Position	Signature	Date
J D Leam	Chair of Trustees	<i>J D Leam</i>	26 September 2022
A Warboys	CEO	<i>A Warboys</i>	26 September 2022

Document History

Version	Date	Author	Revisions
1	1 September 2021	L Binks	N/A
2	1 September 2022	L Binks	N/A

1. Introduction

Accord MAT (the Trust) is committed to the highest standards of ethical conduct in all of our activities. This Statement is designed to satisfy the requirements of Part 6, Section 54 of the Modern Slavery Act (2015). The Trust will not engage in, or condone, the practices of human trafficking, slavery or forced labour. The Trust procures goods and services from third party contractors predominantly based in the UK.

2. About Accord Multi Academy Trust

The Accord Multi Academy Trust is an educational charity established in September 2016 that is currently made up of four academies who were the founding members of the Trust. In September 2016 Horbury Academy and Ossett Academy & Sixth Form College came together, moving away from their stand-alone Trust status and were joined in December 2016 by Horbury Primary Academy and Middlestown Primary Academy.

The overarching vision for the Trust is to work in one 'Accord – celebrating the differences of each academy through strong collaboration in order to inspire all members of our learning community to be the best that they can be.'

Our academies work on the following key principles:



Our vision and key principles are underpinned by the highest expectations on what every child can achieve regardless of their context or starting point with an aspiration to provide a world class education for all young people within our community.

Trust academies work in one Accord with a single, shared vision.

3. Risk Assessment and Management

Senior Leaders and Trustees have identified and documented the risks to which the Trust is exposed. These risks are reported to and reviewed by the Trust's Audit and Risk Committee regularly. Risk management strategies have been implemented and are monitored and reviewed on a regular basis.

The Trust carries out internal and external audits which include policy compliance. The outcomes of these audits are included in reports to the Audit and Risk Committee and to the Board of Trustees.

The Trust's overall risk management plan is aimed at:

- Protecting its pupils, staff and assets;

- Managing risk in accordance with best practice and reducing the cost of risk;
- Anticipating and responding to changing social, environmental and legislative requirements;
- Raising awareness of the need for risk management;
- Integrating risk management into the culture of the Trust;
- Adopting legal compliance as a minimum standard.

The Trust’s financial Regulations have been updated to include reference to the Modern Slavery Act, and Trust / academy colleagues have been briefed in its implications for procurement.

4. Supply Chains

The Trust’s Financial Regulations include reference to the Modern Slavery Act in relation to procurement.

We have carried out a risk assessment of our supply chain against the likelihood of the following three traits of slavery and human trafficking occurring:

- Forced labour;
- Work and life under duress;
- Impossibility of leaving an employer.

Each key risk area is listed below along with a description of our strategy to reduce the risk of modern slavery in each area.

Key Risk Area	Strategy To Reduce Risk
Catering Services and Supplies	<p>Catering services are in some instances outsourced. Compliant procurement processes are followed upon appointment of cleaning contractors. A Whistleblowing Policy is in place.</p> <p>Catering supplies for in-house provision are provided by approved suppliers who operate and abide by the Modern Slavery Act standards. Modern slavery is explicitly mentioned in the contract and/or purchase order and discussed with the supplier. A low level of risk remains in the caterer’s supply chain.</p>
Cleaning Services and Supplies	<p>Cleaning services are in some instances outsourced. Compliant procurement processes are followed upon appointment of cleaning contractors. A Whistleblowing Policy is in place.</p> <p>Cleaning supplies for in-house provision are provided by approved suppliers who operate and abide by the Modern Slavery Act standards. Modern slavery is explicitly mentioned in the contract and/or purchase order and discussed with the supplier. A low level of risk remains in the caterer’s supply chain.</p>
Estate Management, construction and	Compliant procurement processes are followed and some procurement in this area is with suppliers who are preapproved by a purchasing framework. Wherever possible we ensure Modern Slavery controls are

maintenance of services	discussed with new suppliers and the issue is specifically referred to in new contracts.
ICT Equipment and Services	Compliant procurement processes are followed and a considerable proportion of procurement in this area is with suppliers who are preapproved by a purchasing framework.
Supply/Agency Staff	Compliant procurement processes are followed and a considerable proportion of procurement in this area is with suppliers who are preapproved by a purchasing framework.
Education equipment, textbooks and resources suppliers	The Trust uses preferred suppliers for the bulk of education equipment. Wherever possible we ensure Modern Slavery controls are discussed with new suppliers and the issue is specifically referred to in new contracts and/or purchase orders. Where other suppliers are used further controls, such as avoiding overseas suppliers are in place.
Pupil and staff uniform suppliers	Only local and approved uniform suppliers are used. All suppliers are adhering to the requirements of the Modern Slavery Act.

5. Measuring Effectiveness

Over the last year we have taken proactive steps to ensure compliance with the Modern Slavery Act (MSA) is inherent in the procurement procedures we use, we are constantly vigilant across the Trust and have raised awareness with relevant staff (Finance, HR and Business Operations).

We will continue to take the following steps to promote awareness of this during 2022/23:

- Include steps for compliance with the Trust Code of Conduct for Suppliers as a condition or criterion in specification and tender documents.
- Communicate to all suppliers, that they adhere to the Code of Conduct for Suppliers.
- Raise awareness amongst Trust teams who are involved in employment, procurement and management, of the risks of modern slavery occurring within our supply chains.
- Raise awareness to all Trust employees.
- Ensure all relevant new employees receive awareness training as part of their induction.
- Review the Trust's Procurement Policy to ensure the policy is fit for purpose and all colleagues involved in purchasing across the Trust understand their responsibilities in relation to it.
- To ensure that staff, Governors and Trustees are aware of current legislation surrounding equality and diversity and understand the Trust's responsibility.
- To promote cultural understanding and awareness of all groups and academy communities.
- To promote mental health awareness and develop a Well-Being Strategy including avenues of support and interventions where necessary.

6. Policies

We are confident that our policies promote good behaviour among our employees within the Trust. Our policies and procedures are kept under review to make sure that they reflect the changing needs of the Trust, our academies and of the staff, pupils, students and the communities it serves. We are determined that there shall be no modern slavery or human trafficking in Accord Multi Academy

Trust. Our policies enhance our commitment to act ethically and with integrity throughout our academies and central team.

Our policies designed to help us avoid modern slavery or human trafficking under the Act are:

- Code of Conduct (including Gifts and Hospitality, and Conduct for Suppliers)
- Safeguarding & Child Protection Policy
- Recruitment & Selection Policy
- Whistleblowing Policy
- Equality & Diversity Policy
- Financial Management Policies

7. Due Diligence

Our Recruitment & Selection Policy ensures that all prospective employees are legally entitled to work in the UK.

All our academies complete an annual safeguarding audit, conducted by academy Designated Safeguarding Leads and reviewed by the Local Authority Safeguarding Advisor and Academy Education Committees.

8. Raising Awareness & Training for Staff

All Trust employees will be briefed on the Trust's Modern Slavery Statement and policy awareness will be included in the induction process for all new staff.

9. Procurement

The Trust is committed to ensuring that workers employed or engaged in its supply chains throughout the world are treated fairly, humanely and equitably and to this end we shall comply, and shall ensure as far as is reasonably possible that its sub-contractors comply, in relation to all workers employed or engaged by it directly or indirectly in connection with the supply of goods and the performance of the Services, with the Modern Slavery Act 2015.

A considerable proportion of our procurement is with suppliers who either are pre-approved by a purchasing consortium / framework or are appointed by means of a tender process.

We have identified that some of our procurement takes place within sectors where modern slavery offences could occur such as within our catering, cleaning, school uniform supply chains and building contractors.

All our contractors are required to check an individual's right to work in the UK and carry out an enhanced DBS check prior to hiring staff to work in our academies. It is the responsibility of the contractor to ensure that the same checks are carried out on any sub-contractors prior to inviting them to work within our academies.

When one of our academies is selecting a new supplier, such as a school uniform supplier we will consider the supplier's ethical trading policies and review their code of conduct for suppliers as part of the tender and selection process.

Where new suppliers are required, the Trust undertakes due diligence and will include compliance with the Modern Slavery Act as a condition or criterion in tender documents.

10. Conclusion

This statement relates to the financial year 2021/22 which ended on 31 August 2022.

This statement will be reviewed on an annual basis in line with the Trust's financial year and/or Modern Slavery reporting requirements.