

A collaboration of schools which enhances the educational experiences and outcomes for children, maximising the benefits of working together, whilst maintaining the individual culture and ethos of each individual school

# **Modern Slavery Statement**

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Approver: People & Pay Committee				
Date:	16 <sup>th</sup> June 2025			
<b>Next review:</b> June 2026 unless there are earlier statutory or guidance changes				
Category of policy:	Trust Board			

# **Changes history**

Version:	Date:	Amended by:	Substantive changes:	Purpose:
1				New trust
				policy

This statement is made on behalf of the Agape Multi Academy Trust (company number 07682284) pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. This statement relates to our activities from year 1<sup>st</sup> March 2024.

Our Trust has Agape, Christian love, as its bedrock alongside Christian values of equality, respect and compassion. Our schools' accompanying Christian visions are based on key passages from the Bible to 'have life to the full' (John 10:10) and to 'Go and do likewise' Luke 10:25-37. We are fully committed to enabling all our school community to flourish socially, academically and emotionally and to create an environment where everyone is equally valued and cherished. We therefore recognise that we have a responsibility to take a robust approach to slavery and to human trafficking. We are absolutely committed to preventing slavery and human trafficking within our activities and to ensure our supply chains are free from slavery and human trafficking.

This statement sets out our actions to understand all potential modern slavery risks related to our activities and to put in place steps that have the aim of ensuring that there is no slavery or human trafficking in our activities or supply chains.

## Structure, activities and supply chains

We are a multi academy trust based in Berkshire. Currently we have an all through school and a secondary school in our Trust. We were established on 1<sup>st</sup> March 2024 with the vision to enhance the educational experiences and outcomes for children, maximising the benefits of working together, whilst maintaining the individual culture and ethos of each individual school.

Our Trust has two levels:

- a trust level that oversees the business as a whole
- at local level each individual school.

We have over 2,500 pupils, 4.46% of whom have English as an additional language.

We employ over 370 staff.

All of our operations are based in the UK.

Our suppliers are based in the UK and cover key activities within our business including catering, cleaning, agency staff, audit services, uniform suppliers and peripatetic music services.

We work to the highest professional standards and comply with all laws, regulations, and rules relevant to our activities. 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 relations.

### Policies relating to slavery and human trafficking

Our policies aim to promote excellent working practices and to safeguard our school community. Our policies and procedures are kept under regular review to make sure that they reflect the changing needs of our staff, students/pupils, and the communities they serve. They are also reviewed in response to any changes in law, or government regulations or guidance.

We have the following policies/procedures that we believe promotes our aim to prevent slavery or human trafficking in our activities:

- Equality policy and objectives
- Child protection & safeguarding
- Whistleblowing
- Safer recruitment
- Finance including procurement
- Staff code of conduct
- Gifts, anti-bribery and hospitality
- Complaints
- Staff grievance

We report annually to our Trust Board on our equality statistical data and objectives and our gender pay gap.

Our CEO and Headteachers regularly meet with our Professional Representatives to enable them to raise concerns, share insights and promote awareness of employment practices within our trust.

Our policies, which play a part in eradicating slavery and human trafficking, are shared with staff through our internal processes so they are fully understood. Most are published on our website. This creates a culture of accountability where employees feel empowered to report unethical practices.

#### Identifying risks and taking steps to manage it

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

- matters of a safeguarding nature which covers child sex exploitation or human trafficking which can directly impact our pupils/students and their families. This also potentially affects our staff and the staff of our contractors.
- our supply chain

### Safeguarding

Safeguarding is of the utmost priority to the Trust and all of our staff. We uphold our statutory duties and strive to safeguard staff and pupils/students through a culture of safeguarding which permeates everything we do.

We have a Designated Safeguarding Lead in each of our schools expertly supported by a team of Deputy Designated Safeguarding leads. Each school has a Safeguarding Governor and the Trust has a Safeguarding Trustee. All work together to implement policy and to secure excellent safeguarding practice across our Trust. All are given the training they require on an ongoing basis to enable them to carry out their roles with the utmost expertise. The Trust has a safeguarding network group where best practice is shared and allows for collaboration.

In addition, each school proactively works with the local authorities, the local safeguarding partnerships, the LADO (Local Authority Designated Officer) and local stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking.

Our Child Protection and Safeguarding Policy is reviewed annually by the Trust Central Team, Headteachers, DSL's and the Local Governing Committee of each school and the Board of Trustees. It is fully compliant with all statutory requirements and guidance set out in the most recent Keeping Children Safe in Education and associated guidance.

All staff have a CPOMS account to report any safeguarding concerns. This is in addition to the open-door policy the DSLs and their Deputies have for any member of the school community to access.

## Supply chain

Our procurement procedures set out the requirements we have 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 (Disclosure & Barring Service) check. Should suppliers fail to meet our minimum requirements, or be unwilling to make any changes, we will cease to trade with them.

Frameworks via public sector buying organisations are considered for all tenders and these meet the requirements of the Modern Slavery Act 2015 by default. In the event we opt not to use an existing framework all tenders go through the CFOO and the Finance & Resources Committee of the Trust Board at which point the modern slavery risk will be considered and incorporated into the tender evaluation criteria.

All members of our school community are expected to challenge and report any breaches of this policy. This can be done via speaking to one of our DSL's/Member of our Safeguarding team, raising a CPOMS concern, speaking to a member of SLT and/or following our complaints or whistleblowing policies.

#### **Effectiveness of procedures**

The quality and impact of our safeguarding practice is reviewed at every level of our Trust. Safeguarding policy and practice is reviewed through:

- Termly meetings with the Safeguarding Governors
- Every Local Governing Committee meeting through a specific standing agenda item
- At Trust Curriculum Committee meetings through a specific standing agenda item
- Internal and external safeguarding audits

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

Our procurement procedures are subject to internal audit review, as well as assessed by our external auditors annually. Our Trust Board's Finance and Resources Committee reviews and oversees any action identified by internal or external audits.

We will be taking the following steps to strengthen our procedures:

- Continuing to raise awareness with our school-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
- Complete a desk-based audit of our key suppliers' statements to reassure ourselves they continue to operate in accordance with the requirements of the act.
- Carry out a trust wide external safeguarding audit to reassure us of our excellent practice
- To review policies to ensure they draw attention to, where relevant, the risk of modern slavery or human trafficking
- To emphasize to all staff a report or concern can be made under the protection of the whistleblowing policy

#### Training available to staff

Every member of staff, governor and trustee is required to undertake safeguarding training as soon as they join our organisation and at least annually thereafter. They are required to sign a declaration annually that they have carried out the training and will comply with the staff, governor or trustee code of conduct, as appropriate. Our safeguarding training focuses on early identification of those at risk of exploitation and training to help everyone know what to do if they become aware of any potential risks. We are fully satisfied that through our robust safeguarding training that staff, governors and trustees could identify and act appropriately for at risk pupils, staff, and contractors.

In addition, new staff are asked to read and sign to say that they have read and understood the staff code of conduct, child protection & safeguarding policy and 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. The policies are published on the school and trust websites and on internal staff intranets. When any policy is updated staff are alerted to it.

Our Finance and HR teams are trained and are aware of our safer recruitment and procurement processes.

We will ensure that this statement is circulated to all staff, governors and trustees to ensure that they are aware of this policy

## **Equality Act 2010**

We have carefully considered and analysed the impact of this policy on equality and the possible implications for staff with protected characteristics as part of our commitment to meet the public sector duty requirement to have regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations. If you feel you have or may be negatively impacted by this policy please contact us.