

AET Modern Slavery Statement 2021-22

Modern slavery remains a crime that affects millions of individuals around the world. The Modern Slavery Act 2015 defines these offences as those of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. At AET, we are committed to ensuring that modern slavery is not tolerated and encourage all those employed by the Trust, or associated with it, to take a proactive approach to tackling this type of crime. Trustees at AET have not had cause to believe that modern slavery practices have occurred within the Trust or within its supply chains, but remain keenly aware of the need for continued vigilance.

1. Structure and supply chains

AET is a multi-academy trust comprising a range of primary, secondary and special schools across the country. It is a single legal entity and an exempt charity, whose financial year ends on 31 August. It is also the parent company of Unity City Academy Trust. AET came in scope of the Section 54 obligation to publish a Modern Slavery Statement at the end of academy financial year 2015-16.

The Trust's main business operations are in the provision of education. It is supported by a large number of suppliers of various sizes, the vast majority of which are entirely UK-based.

2. Policies in relation to slavery and human trafficking

We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. AET maintains a [Modern Slavery Policy](#), published on the AET website, reflecting this commitment to act ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

3. Due diligence processes

As part of our initiative to identify and mitigate risk, we will incorporate a review of controls undertaken by our suppliers. Extensive due diligence activities already take place at schools that are due to join the Trust. Detailed HR and contracts information is gathered as part of this and any irregularity is challenged prior to conversion, then addressed upon conversion if it is outstanding.

As noted below (*'Actions taken by the Trust'*), AET is making increasing use of consolidated contractual arrangements with larger providers who have their own statements and policies in relation to modern slavery. This will make due diligence in relation to contractors more transparent and efficient.

4. Risk assessment and management

Trustees continue to deem the risk of systemic modern slavery within the Trust itself to be **very low**. This is because recruitment to the Trust takes place within a highly-professional framework and employees and volunteers are subject to legal checks, including Right to Work and DBS. Trustees are, however, clear that even one instance of modern slavery is one too many and are clear on the need to maintain vigilance.

The Trust recognises that it is exposed to a greater slavery and human trafficking risk when dealing with suppliers of products and services. However, Trustees deem the risk of systemic modern slavery within the Trust's supply chains to be **low**. This is because procurement processes are such that reputable firms are contracted and, where cost-effective, larger contractors with their own modern slavery statements or policies are used. Similarly, the Trust makes extensive use of services provided by Local Authorities. Nevertheless, the Trust considers that this risk might increase in the coming year as the ongoing economic impact of the COVID-19 pandemic makes people more susceptible to the insecure, low-paid work that exists at the borderline with modern slavery.

Trustees have, however, had regard to sectoral risks and have identified the following supply chains as requiring enhanced assurances because they are more likely to make use of temporary workers sourced through an intermediary or employment agency:

- **Capital works** – For high-value works, the Trust contracts large firms who have greater ability to provide the service and who are more likely to have their own policies in place in respect of modern slavery.
- **School uniforms** – A review of providers' policies in respect of modern slavery will take place in August 2022.
- **Catering** – In 2021, the Trust moved to having two providers of catering services across all its academies (excluding PFI sites). The provider's approach to modern slavery has been reviewed and Trustees are satisfied that this properly addresses supply chain risks. The Modern Slavery statements for Aspens Services Ltd. has been obtained and the Trust is satisfied with their actions. Hutchison Catering are not required to produce a statement as their turnover is insufficient however, we have confirmation from them that they adhere to the principles of the Act within their operation.
- **Estates management (including cleaning)** – The Trust has engaged the services of ISS to manage Planned Preventative Maintenance across all academies and ISS has its own [policies](#) in place in respect modern slavery. Other services are directly employed by the Trust and additional assurances will be sought in relation to outstanding contractors in 2021.

5. Measuring effectiveness

The Finance Committee of the Board of Trustees reviews the Procurement Policy and modern slavery statement annually.

6. Training for staff

All school staff and School Support Services colleagues have received training in Part 1 of Keeping Children Safe in Education 2021, which includes reference to child criminal exploitation.

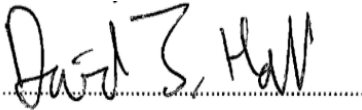
7. Actions taken by the Trust

- In October 2021, the Board approved the [Safeguarding Policy](#), which already contains specific reference to child criminal exploitation and will be amended to make specific reference to modern slavery for September 2021.
- In June 2021, the Board approved the [Whistleblowing Policy](#) to promote each person's duty to raise concerns of wrongdoing and criminality. Incidents of whistleblowing are routinely reported to the Audit & Risk Committee.
- In January 2022, the Finance Committee approved the [Procurement Policy](#), which contains

a section specifically covering ethical procurement practices and compliance with the Modern Slavery Act 2015.

- AET continues to move towards Trust-wide contracts with large, established firms, many of which have their own statements or policies on modern slavery. This includes cleaning, catering, supply staffing and all high-value capital contracts.

This statement was agreed by Trustees on 23 June 2022 and constitutes the Trust's modern slavery statement for the financial year ending 31 August 2022.



David Hall
Chair of Trustees