

# Modern Slavery Statement 2024/25

## Introduction

This statement is designed to satisfy the requirements of Part 6 Section 54 of the Modern Slavery Act (2015).

Beckfoot Trust does not engage in, or condone, the practices of human trafficking, slavery or forced labour.

We are committed to the highest standards of ethical conduct in all our activities and making continuous improvement in this area.

## About Beckfoot Trust

Beckfoot Trust is a multi-academy trust made up of 4 primary schools, 4 secondary schools, and 2 special schools closely located in the Bradford district. We provide education to more than 7,000 young people, employ over 1,000 staff and have an annual budget of £60m. We believe that by working in partnership, our schools can transform life chances and strengthen communities. Together, we are working to create remarkable schools where no child is left behind.

## Risk Assessment and Management

Risk management is embedded throughout the Trust's operations, with any risks identified and mitigations being shared with the Trustees through the Audit and Risk Committee. The Trust engages with an independent Internal Audit service who review and report on adherence to policies and procedures. Non-compliance, if identified, is reported to the Board of Trustees through the committee. The Trust has assessed its risks of modern slavery and human trafficking and has included below specific activities that may be considered as a risk to the Trust.

The Trust has identified that some risks of modern slavery and human trafficking may exist within the following supply chains:

- Catering
- Cleaning
- Provision of agency staff
- Manufacturing of ICT equipment
- School uniforms.

These risks are deemed to be low and have been mitigated as far as possible in that for the provision of these services, we use suppliers who are pre-approved by a purchasing consortium such as Crown Commercial Services (CCS) or Crescent Purchasing Consortium (CPC) or appointed through means of a formal tender process.

## Supply chains

The Trust works primarily with UK based suppliers and contractors and employees are protected under UK employment law and working time directives. We remain aware of the need to ensure that the Trust and companies within our supply chain share our commitment to treating employees ethically and with integrity. When considering the organisation's activities, we believe that the risk of slavery and human trafficking is low.

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.

We expect our suppliers to fulfil their obligations to comply with the provisions of the Modern Slavery Act. Modern Slavery and Human Trafficking are included within our new supplier risk assessment and due diligence procedures. We will continue to build upon our existing systems to identify, assess and monitor potential risk in our supply chains. The Trust reserves the right to exclude any bidder, contractor or service-provider who has been convicted of an offence under the Modern Slavery Act 2015.

The Trust's Financial Regulations include reference to the Modern Slavery Act in relation to procurement. Whilst the overall risk of modern slavery in our supply chains is low due to us working mainly with UK based suppliers and ensuring new suppliers follow regulations where appropriate, we have deemed the following areas to be more of a risk. For each area listed below there is a description of our strategy to further reduce the risk of modern slavery in that area.

<b>Key Risk Area</b>	<b>Strategy To Reduce Risk</b>
Catering Services and Supplies	Catering services provided by one supplier who operates under Bradford Local Authority regulations and abides by their Modern Slavery standards. Modern slavery is explicitly mentioned in the contract and discussed with the supplier. A low level of risk remains in the caterer's supply chain.
Cleaning Services and Supplies	Cleaning services are partially outsourced to one supplier. The supplier has its own anti-slavery policy and was procured through a compliant framework. A whistleblowing policy is in place.
Estate Management, construction and maintenance of services and 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. Wherever possible we ensure Modern Slavery controls are discussed with new suppliers and the issue is specifically referred to in new contracts.
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. This ensures UK law is followed. The Trust ensures all supply staff are fully vetted by agencies, in line with Keeping Children Safe in Education, providing further assurance.
Education equipment, textbooks and resources suppliers	The Trust uses a preferred supplier for the bulk of education equipment. This supplier has a clear Modern Slavery Policy in place. Where other suppliers are used further controls, such as avoiding overseas suppliers are in place.  Amazon purchases are kept to a minimum and must be from companies registered in the UK and with VAT registration.
Student and staff uniform suppliers	Local suppliers are used and where relevant the Trust ensures that they have their own modern slavery statement.

## Measuring Effectiveness

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

We will continue to take the following steps to promote awareness of this during 2024/25:

- Revisit the Trust Code of Conduct for Suppliers, updating it for latest law and guidance

- Include steps for compliance with the Trust Code of Conduct for Suppliers as a condition or criterion in specification and tender documents wherever possible
- Communicate to all suppliers via documentation on our website, that they adhere to the Code of Conduct for Suppliers
- Raise awareness among our Beckfoot Trust teams who are involved in employment, procurement, and management, of the risks of modern slavery occurring within our supply chains
- Ensure relevant new employees receive awareness training as part of their induction  
Ensure finance and HR teams receive regular training in this area.

## Policies

We have reviewed our existing policies and procedures in light of the Act. We are confident that our policies promote good behaviour among employees within the Trust. Our policies and procedures are kept under review to make sure that they reflect the changing needs of Beckfoot Trust and of the staff, students and the communities it serves. We are determined to do all we can to reduce the risk of modern slavery or human trafficking in Beckfoot Trust. Our policies enhance our commitment to act ethically and with integrity throughout our schools.

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

- Code of Conduct for Suppliers
- Code of Conduct for Employees
- Finance Policy
- Child Protection and Safeguarding Policy
- Recruitment and Selection Policy (including safer recruitment practice)
- Whistleblowing Policy
- Equity, Diversity and Inclusion Policy
- Equality Statement and Objectives
- Gifts and Hospitality Policy.

## Recruitment

Our recruitment processes include rigorous pre-employment checks for all new employees. These include checks on identity, right to work in the UK, references, qualification and checks with the Disclosure and Barring Service. We must ensure that all applicants are genuine and acting freely. Similar checks will be carried out when using Supply Agencies.

This statement relates to the financial year 2023/24 which ended on 31 August 2024.

This statement will be reviewed on an annual basis in line with Beckfoot Trust's financial year.

Signed by



Shirley Watson

CEO

16 January 2025