MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction
Star Academies continues to be committed to the highest standards of ethical conduct and to preventing and eliminating any form of modern slavery and/or human trafficking in its operations and its supply chain.

The Trust works primarily with UK-based suppliers and contractors whose employees are protected under UK employment laws and working time directives. Whilst the Trust itself does not conduct business in countries where there is a documented problem with human trafficking and/or modern slavery, we remain acutely aware of the need to ensure that companies within our supply chain share our commitment to treating their employees fairly and ethically.

This statement outlines the steps the Trust takes to understand all potential modern slavery risks and to ensure that our organisation is fully compliant with the Modern Slavery Act 2015.

Aims
- To ensure the Trust fulfils its statutory responsibilities under the Modern Slavery Act 2015**;**
- To demonstrate the Trust's commitment to combatting modern slavery and human trafficking;
- To outline the procedures the Trust intends to put in place to ensure its current and prospective suppliers are not engaged in any practices associated with modern slavery and/or human trafficking;
- To support the mission, vision and values of the Trust and its establishments.

About Star Academies
Star Academies is a mixed Multi-Academy Trust that runs a diverse network of primary and secondary schools in Lancashire, Greater Manchester, West Yorkshire, the Midlands and London. We are a values-based organisation, committed to enhancing social mobility. All our efforts are geared towards raising the aspirations of children and young people in areas of social and economic deprivation to improve their life chances and help them succeed at the highest levels of education, employment and the professions.

Star Academies is one of the country's leading education providers, and our schools promote excellence in everything they do. In every school, the entire staff team – working in partnership with parents and the local community – is committed to nurturing today's young people and inspiring tomorrow's leaders.

Our Commitment
We are committed to ensuring that there is no modern slavery or human trafficking in any part of our organisation and, in so far as is possible, we require our suppliers to demonstrate a similar level of commitment. We resolve to:

- Comply with legislation and regulatory requirements;
- Make suppliers and service providers aware that we adhere to the requirements set out in the Modern Slavery Act 2015;
- Consider modern slavery factors when making procurement decisions; and
- Develop an increased awareness of modern slavery issues.

Our Policies

We have reviewed our policies and procedures in light of the Modern Slavery Act 2015 and are confident that they promote anti-slavery and seek to eliminate human trafficking practices, in particular there is the following:

- **Anti-Harassment and Bullying Policy** - promotes an inclusive environment in which all staff and pupils are treated with dignity and respect, and where harassment and bullying are not tolerated.
- **Recruitment and Selection Policy** – ensures that all staff recruited to work within the Trust or one of its establishments are subject to rigorous checks, including DBS, disqualification, barred list and prohibition checks together with identity and right to work in the UK checks and references. Where it is necessary to hire agency staff, we only use reputable agencies that have been vetted through the Trust's procurement procedures and who apply the same rigorous employment checks as the Trust.
- **Safeguarding (Child Protection) Policy** - provides a framework for our schools to identify and support pupils at risk of abuse, including children who are at risk of modern slavery, trafficking or exploitation.
- **Vetting and Due Diligence Policy** – ensures that everybody who has a role in our establishments has views and opinions consistent with our values and ethos and protects pupils and staff from inappropriate influences.
- **Whistleblowing Policy** – encourages staff to report concerns about potential wrongdoing, which includes any related to modern slavery and/or human trafficking. All concerns raised under the Whistleblowing Policy are fully investigated and appropriate actions taken.

Our Supply Chain

We buy a wide range of goods and services, in accordance with public procurement legislation and our ethical sourcing principles and practices. These include construction services and supplies, furniture and stationery, electronics (computers, audio visual, etc.), food and catering supplies, travel services, laboratory supplies (equipment and chemicals etc.), books and printing, and waste and recycling services.

Risk Management

Risk management is embedded in the day to day operation of the Trust. Trustees and Senior Management have formally identified and documented the major risks to which we are exposed. Those risks have been reviewed by the Board and Audit Committee. Risk management strategies have been, and continue to be, implemented.

Our internal auditor carries out regular testing of internal procedures and controls, including adherence to policies and procedures. Any areas of non-compliance are included in internal audit reports, which are communicated to senior managers and the Audit Committee and appropriate actions taken. This is then further tested through our external auditors.

Embedding the Principles

We are fully committed to embedding the principles and responsibilities set out in the Modern Slavery Act 2015 in all elements of our business practice.

To support our delivery on this commitment, we have appointed a dedicated procurement professional who will seek to ensure that all companies within our supply chain have provided either a valid self-certification, if contracted after an OJEU tender process, or are engaged in compliance with UK law to prevent contracting with organisations who are engaged in modern slavery and/or human trafficking. These requirements are also referenced in our contract documentation which are signed up to by the majority of suppliers who provide our goods and services.

Ethical Sourcing Practices

When sourcing suppliers for our contracts we will seek to work with suppliers who (throughout their supply chain):

- afford their employees the freedom to choose to work for them. Employees should be free to leave the supplier after reasonable notice is served. Suppliers should not use forced, bonded or non-voluntary prison labour
- establish recognised employment relationships with their employees that are in accordance with their national law and good practice. Suppliers should not seek to avoid providing employees with their legal or contractual rights
- can demonstrate a commitment to equality of opportunity for individuals and groups enabling them to live their lives free from discrimination and oppression
- impose working hours on their staff which are compliant with national laws or industry standards
- under no circumstances abuse or intimidate, in any fashion, employees and have appropriate disciplinary, grievance and appeal procedures in place
- work within the laws of their country
- take appropriate measures to ensure the health and safety of their workforce and the wider public.
- support our view that the long-term elimination of child labour is ultimately in the best interests of children, and have taken measures to ensure that child labour is not utilised in their operations
- do not support, encourage or facilitate the trade in drugs, arms, slavery or prostitution
- support their employees by paying the real living wage
- offer wages and benefits that at least meet relevant industry benchmarks or national legal standards, and
- do not commit or contribute to any gross abuses of human rights.

In addition, we will:

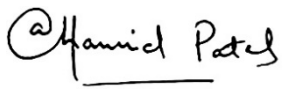
- encourage ethical sourcing practices among our suppliers and the broader market
- ensure that ethical sourcing practices are a priority when engaging new suppliers
- refuse to award any contract to suppliers who fail to demonstrate their commitment to ensuring that modern slavery and human trafficking are not taking place within their own business or supply chains.

Training and Awareness-Raising

Throughout the next twelve months we will continue to raise staff awareness of the Modern Slavery Act 2015. Our schools will continue to deliver training for staff on Child Sexual Exploitation (CSE) and to educate pupils on slavery and human trafficking through the History and Geography curricula and deliver units on CSE through Citizenship lessons.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31st August 2022.

SIGNATURE:



POSITION: Chief Executive **DATE: 1st September 2022**