Modern Slavery Statement

Severn Academies Educational Trust (SAET) is legally required under the Modern Slavery Act 2015 to publish an annual Modern Slavery Statement. This statement sets out the steps that the Trust takes to tackle modern slavery. Annex A outlines key definitions taken from 'Transparency in Supply Chains etc. A practical guide' issued by GOV.UK. www.gov.uk/homeoffice/modern-slavery-business-guidance

Introduction

Severn Academies Educational Trust is a group of eight schools located in and around the Wyre Forest district of Worcestershire. The Trust has around 475 employees and an annual turnover in excess of £36m. Services and goods are procured from third party providers predominantly based within the UK.

The Trust strongly values:

- The ethical treatment of all individuals.
- The safeguarding of children, young people and vulnerable adults.
- The responsible, accountable and compliant spending of public and charitable funds.

The trust pursues the above values in all aspects of its operations, meaning we are committed to ensuring that business operations are completely free from modern slavery and human trafficking.

Structure and supply chains

SAET operates in the education sector and includes eight schools: six primary schools and two secondary schools. The Trust works collaboratively with a wide range of educational partners including other schools locally, regionally and nationally. Local Governing Bodies within all eight schools report to the SAET Board of Trustees, which has oversight of the organisation to compliance with all legislation including the Modern Slavery Act 2015. The CEO reports to the Trustees who bear ultimate legal responsibility for the organisation's activity.

SAET uses a number of suppliers to support operations and activities. As part of the tender processes, it is a key consideration that major sub-contractors are fully compliant with all employment, equality and environmental legislation and that, where applicable, they are compliant with the annual reporting requirements contained within section 54 of the Modern Slavery Act (the Act). These suppliers mostly supply services relating to construction and premises, consultants, training providers and professional services. The Trust also procures goods in the form of food and office supplies, furniture, IT hardware and other materials used in day to day operations.

SAET regularly reviews its supply base to assess if any major suppliers represented a risk to the Trust's compliance with the Act.

<u>Policies on modern slavery and human trafficking</u>

SAET is committed to continued policy development to ensure that we keep up to date with all changes in legislation, including full compliance with the Modern Slavery Act. To aid this, SAET has promoted a culture of awareness by using organisation-wide communication systems to relay any significant changes to key employment legislation.

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All key sub-contractors should be able to demonstrate full adherence to key employment legislation. This ensures that the welfare and well-being of all employees are fully protected at all times. A wide policy framework that supports the aims of the Modern Slavery Act:

- Safeguarding Children Policy and training
- Confidential Reporting Policy
- Grievance Policy
- Recruitment & Selection Policy
- Code of Conduct
- Pay Policy
- Equality Policy
- Health and Safety Policy

Due diligence and risk assessment

The trust seeks the highest standards of compliance, ethics and integrity in all areas of the organisation and is committed to ensuring due diligence is always conducted with regard to ensuring modern slavery holds no place in its operations.

The Trust follows the guidance issued under section 54(9) of the Modern Slavery Act 2015 which seeks to address the role of businesses in preventing modern slavery from occurring in their supply chains and organisations. The document 'Transparency in Supply Chains etc. A practical guide' is issued by GOV.UK www.gov.uk/homeoffice/modern-slavery-business-guidance

The Trust conducts all its recruitment processes in line with its Child Protection and Safeguarding Policy, which lays out rigorous steps to ensure that all prospective employees are legally entitled to work in the UK. As part of the procurement and contracting process with all key sub-contractors and suppliers, SAET carries out detailed financial and legal due diligence checks for all large supply arrangements.

As part of the due diligence process SAET carries out risk assessments for all projects that are managed by the organisation including risk management measures such as contract risk registers. These are constantly reviewed by senior management to ensure their continued effectiveness in managing any risk.

As part of the risk management around the Act, SAET includes consideration of risks relating to modern slavery in internal risk assessment processes. This requires SAET to put in place mitigating actions to avoid non-compliance with the Act. Due to the nature of the sector that SAET operates in, and the heavy regulation and supervision it receives from UK Governmental departments, the risks are regarded as minimal and the likelihood of them occurring very low.

As part of the ongoing procurement function the charity will continue to assess and review the areas of the organisation where the Act could be contravened.

Measuring effectiveness

SAET regularly reviews its effectiveness in ensuring that slavery and human trafficking is not taking place in its organisation or supply chains. SAET's Modern Slavery Statement will be reviewed and updated annually.

Training for staff

The Trust is committed to:

- Regularly review and update procurement and key policies across the organisation
- Ensure that modern slavery is addressed throughout the procurement process by implementing due diligence and risk checks that evaluate potential suppliers in relation to modern slavery and identify improvements before they enter the supply chain.
- Provide specific Modern Slavery Act training to key individuals and teams across the organisation who are responsible for managing contractual relationships.
- Raise awareness across the wider organisation via internal communication channels such as monthly newsletter and publishing a full copy of the Modern Slavery Act 2015 on the SAET website to ensure it is accessible to all employees
- Educate students, for example through the History (slavery, and child labour) & Geography (human trafficking) departments in the secondary academies.

This statement applies to **all** academies within the Trust.

Approval

This statement has been approved in full by the Severn Academies Educational Trust Board and will be implemented by the CEO and Trust Leaders across Severn Academies Educational Trust.

Signed:

Chair of Trustees

Date: March 2023

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Annex A

Source: Guidance issued under section 54(9) of the Modern Slavery Act 2015. 'Transparency in Supply Chains etc. A practical guide' issued by GOV.UK.
www.gov.uk/homeoffice/modern-slavery-business-guidance

Modern Slavery Definition
Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. The offences are set out in section 1 and section 2 of the Act, which can be found at:
http://www.legislation.gov.uk/ukpga/2015/30/section/1/enacted
http://www.legislation.gov.uk/ukpga/2015/30/section/2/enacted

Definition of Slavery and Servitude Slavery
In accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Definition of Forced or Compulsory Labour
Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

Definition of Human Trafficking
An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here:
http://www.legislation.gov.uk/ukpga/2015/30/section/3/enacted

Definition of Child Labour
Child labour is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labour (ILO). The term "child labour" is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of "work" can be called "child labour" depends on the child's age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries. Children can be particularly vulnerable to exploitation, but child labour will not always constitute modern slavery. It will still be necessary to determine whether, based on the facts of the case, the children in question are being exploited in such a way as to constitute slavery, servitude and forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some 'light work' which would not necessarily constitute modern slavery.

'Light work' is defined by article 7 of ILO Convention No. 138. Children do have particular vulnerabilities which should be considered when determining whether modern slavery is taking place. The Modern Slavery Act 2015 specifically recognises that it is not necessary for a child to have been forced, threatened or deceived into their situation for it to be defined as exploitation.

The Worst Forms of Child Labour

The worst forms of child labour are very likely to constitute modern slavery. The worst forms of child labour are defined by article 3 of ILO Convention No. 182 as: a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances; c) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties; d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

Behaviour constituting modern slavery

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment. However, businesses have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (include wage and work hour), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications. There will be cases of exploitation that, whilst being poor labour conditions, nevertheless do not meet the threshold for modern slavery – for example, someone may choose to work for less than the national minimum wage, or in undesirable or unsafe conditions, perhaps for long work hours, without being forced or deceived. Such practices may not amount to modern slavery if the employee can leave freely and easily without threat to themselves or their family. Organisations do still nevertheless have a legal duty to drive out poor labour practices in their business, and a moral duty to influence and incentivise continuous improvements in supply chains.